

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANAPOLIS POWER & LIGHT )  
COMPANY D/B/A AES INDIANA (“AES INDIANA”) )  
FOR AUTHORITY TO INCREASE RATES AND )  
CHARGES FOR ELECTRIC UTILITY SERVICE )  
THROUGH A PHASE-IN RATE ADJUSTMENT; AND )  
FOR APPROVAL OF RELATED RELIEF, )  
INCLUDING (1) REVISED DEPRECIATION RATES, )  
INCLUDING COST OF REMOVAL LESS SALVAGE ) CAUSE NO. 46258  
AND UPDATED DEPRECIATION EXPENSE; (2) )  
ACCOUNTING RELIEF, INCLUDING DEFERRALS )  
AND AMORTIZATIONS, (3) INCLUSION OF )  
CAPITAL INVESTMENT, (4) RATE ADJUSTMENT )  
MECHANISM PROPOSALS, INCLUDING A NEW )  
PROPERTY TAX RIDER, AND (5) NEW SCHEDULES )  
OF RATES, RULES AND REGULATIONS FOR )  
SERVICE. )

**INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR**  
**PUBLIC EXHIBIT NO. 9 – TESTIMONY OF OUCC WITNESS**  
**JAMES S. GARREN**

Respectfully submitted,

INDIANA OFFICE OF UTILITY CONSUMER  
COUNSELOR



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1 LIST OF ATTACHMENTS

2 JSG-1. Resume – James S. Garren

3 JSG-2. Calculation of depreciation rates and accruals.

4 JSG-3. Remaining life calculations

5 JSG-4. AESI responses to data requests

6 JSG-5. Excel Attachment 1 to AESI's Response to Industrial Group's DR 2-1

**I. INTRODUCTION**

**Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.**

A. My name is James S. Garren. I am a Consultant of the firm GDS Associates, Inc. (“GDS”).

My business address is 1850 Parkway Place, Suite 800, Marietta, Georgia 30067.

**Q. HAVE YOU PREPARED A SUMMARY OF YOUR QUALIFICATIONS AND EXPERIENCE?**

A. Yes. Exhibit JSG-1 is a summary of my qualifications and experience.

**Q. PLEASE DESCRIBE YOUR BACKGROUND IN UTILITY DEPRECIATION.**

A. I have worked in the utility field since 2010, when I began working at the consulting firm Snavelly King Majoros & Associates, Inc. as an analyst. I began working primarily in the area of depreciation, assisting Michael J. Majoros in the preparation of depreciation testimony and exhibits. In 2014, I became the firm’s primary expert on depreciation issues. Since that time, I have submitted testimony on dozens of depreciation rate cases across the country, providing testimony on all issues related to depreciation, including service life analysis, net salvage analysis, reserve analysis, and many other issues. In 2015, I was recognized as a Certified Depreciation Professional by the Society of Depreciation Professionals.<sup>1</sup> In 2022, I joined GDS Associates, Inc. as a project manager, continuing my work as a depreciation expert.

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<sup>1</sup> “The Society of Depreciation Professionals was organized in 1987 to recognize the professional field of depreciation analysis and individuals contributing to this field; to promote the professional development and professional ethics of practitioners in the field of depreciation analysis; to collect and exchange information about depreciation analysis; and to provide a national forum of programs and publications concerning depreciation.” <http://www.depr.org/?page=AboutUs>. For certification, an applicant must have at least 5 years of full-time professional depreciation experience, at least 2 years of which must be in the area of depreciation administration. Among other requirements, the applicant must pass a two-part (Technical and Ethics) closed book examination



which includes questions about, *inter alia*, Plant and Reserve Accounting, Life Analysis Concepts, Life Analysis Using Actuarial Models, Life Analysis Using Simulation Models, Salvage and Cost of Retiring Analysis, Technology Forecasting and Depreciation Calculations.” <http://www.depr.org/?page=Certification>.

3. Rejection of an additional 2.5% per year escalation factor to terminal retirement costs.

4. Adjustments to service lives for some plant accounts (Account numbers 352, 354, 355, and 356).

5. Adjustments to net salvage percentages for some plant accounts (Account numbers 351, 352, 354, 355, 361, 362, 365, and 371).

The table below summarizes the impact of my proposed adjustments on the depreciation rates and expenses by function:

**Table JSG-1**  
**Summary of Depreciation Rates and Expenses**  
**(\$ in millions)**  
**Based on December 31, 2026 Plant Balances**

	Spanos Proposed				OUCC Proposed				Difference
	ORIGINAL COST AS OF DECEMBER 31, 2026	CALCULATED ANNUAL ACCRUAL		ORIGINAL COST AS OF DECEMBER 31, 2026	CALCULATED ANNUAL ACCRUAL				
		AMOUNT	RATE		AMOUNT	RATE			
Total Miscellaneous Intangible Plant	\$ 344,852,189	\$ 29,800,107	8.64%	\$ 342,989,004	\$ 29,165,800	8.50%	\$ (634,307)		
Total Steam Production Plant	3,002,208,773	182,253,898	6.07%	3,002,208,773	155,972,304	5.20%	(26,281,594)		
Total Other Production Plant	353,331,422	11,299,695	3.20%	353,331,422	8,616,212	2.44%	(2,683,483)		
Total Other Production - Wind	148,757,424	3,894,717	2.62%	148,757,424	3,661,971	2.46%	(232,746)		
Total Other Production - Solar	1,125,000	64,278	5.71%	1,125,000	60,774	5.40%	(3,504)		
Total Transmission Plant	636,739,094	18,361,709	2.88%	635,031,094	12,744,164	2.01%	(5,617,545)		
Total Distribution Plant	3,123,204,552	94,921,682	3.04%	3,101,449,552	67,998,711	2.19%	(26,922,971)		
Total General Plant	266,869,498	15,793,239	5.92%	264,525,748	15,276,352	5.77%	(516,887)		
Total Depreciable Plant	\$ 7,877,087,952	\$ 356,389,325	4.52%	\$ 7,849,418,017	\$ 293,496,288	3.74%	\$ (62,893,037)		

**Q. WHAT INFORMATION HAVE YOU REVIEWED IN PREPARATION FOR THIS TESTIMONY?**

A. I reviewed AESI's depreciation studies of its electric plant and then prepared data requests that the OUCC served on AESI. I reviewed AESI's responses to these data requests as well as the documents attached to AESI's filing. I also reviewed the data Mr. Spanos used to prepare his depreciation studies. Utilizing this data and applying my own analysis, I recommend adjustments to the depreciation rates and accruals utilized for plant depreciation.

### III. DEPRECIATION – GENERAL

#### Q. WHAT IS DEPRECIATION?

A. In 1958, the National Association of Regulatory Utility Commissioners (“NARUC”) sanctioned the following definition of depreciation: “Depreciation,” as applied to depreciable utility plant, means:

the loss in service value not restored by current maintenance, incurred in connection with the consumption or prospective retirement of utility plant in the course of service from causes which are known to be in current operation and against which the utility is not protected by insurance. Among the causes to be given consideration are wear and tear, decay, action of elements, inadequacy, obsolescence, changes in the art, changes in demand, and requirements of public authorities.<sup>2</sup>

Another commonly cited definition of depreciation is that of the American Institute of Certified Public Accountants:<sup>3</sup>

Depreciation accounting is a system of accounting which aims to distribute the cost or other basic value of tangible capital assets, less salvage (if any) over the estimated useful life of the unit (which may be a group of assets) in a systematic and rational manner. It is a process of allocation, not of valuation. Depreciation for the year is the portion of the total charge under such a system that is allocated to the year. Although the allocation may properly take into account occurrences during the year, it is not intended to be a measurement of the effect of all such occurrences.

In short, depreciation is the process of recovering the initial investment in tangible capital assets in a systematic fashion over the useful service life of the plant, recognizing that utility plant is typically a group of investments.

#### Q. CAN DEPRECIATION BE CALCULATED WITH PRECISION?

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<sup>2</sup> National Association of Railroad and Utilities Commissioners, *Uniform System of Accounts for Class A and Class B Electric Utilities*, 1958, rev. 1962.

<sup>3</sup> American Institute of Certified Public Accountants, *Accounting Research and Terminology Bulletin #1*.

1 A. No, because it requires an estimation of the total and remaining service life of plant.  
2 However, to ensure the analysis is as accurate as is reasonably possible, it requires the  
3 knowledge and informed judgment of an expert trained in the field of utility depreciation.  
4 The judgment pertains to the estimation of the future surviving life of plant as indicated by  
5 past patterns of retirements, industry trends, and corporate investment plans.

6 One of the practical goals of performing a depreciation study is to reduce the  
7 negative impact of inevitable errors in the estimation of average service lives and  
8 retirement curves over the long run. One of the reasons for the rapid adoption of the  
9 remaining life method of depreciation is it is self-correcting of the inevitable errors made  
10 in the process of estimation. One of the dangers of depreciation is in assuming a greater  
11 degree of precision in our estimates than is realistic and using methodologies that might  
12 over- or under-collect depreciation to the point that reserves need to be rebalanced, even  
13 with the use of remaining life.

14 **Q. WHAT ARE THE BASIC PARAMETERS USED TO DEVELOP A**  
15 **DEPRECIATION RATE?**

16 A. At its simplest level, the only parameter that is absolutely required is an estimate of the  
17 service life of the asset being retired. The reciprocal of that number can be used as the  
18 depreciation rate (*i.e.*, the number one divided by the estimated service life of the asset).  
19 Because most utility depreciation rates are applied to *groups* of assets with varying lives,  
20 however, virtually all utilities use “remaining life” depreciation. This “remaining life”  
21 procedure computes the depreciation rate by dividing the unrecovered net investment by  
22 the estimated remaining years of the asset’s (or group of assets’) service life. It is intended  
23 to ensure that any past under- or over-accruals of depreciation are recovered during the

1 remaining life of the asset.

2 The remaining life procedure requires an estimate of the dispersion of retirements  
3 around an average service life. In the utility industry, this dispersion is usually described  
4 in terms of "Iowa Curves," so named because they were developed at Iowa State  
5 University. These curves describe how closely the retirements are grouped around the  
6 average service life and whether they tend to occur more rapidly before, after, or coincident  
7 with the average service life.<sup>4</sup> I discuss Iowa curves in more detail in a later section of this  
8 testimony.

9 **Q. PLEASE ILLUSTRATE HOW THE PARAMETERS YOU HAVE JUST**  
10 **DESCRIBED ARE USED TO DEVELOP DEPRECIATION RATES.**

11 A. Beginning with a simple example, assume a single asset with a 20-year life.<sup>5</sup> Its  
12 depreciation rate is the reciprocal of 20:

$$1/20 = 5\%$$

14 Now, let us assume the asset is expected to have salvage value equivalent to 5  
15 percent of its investment value.<sup>6</sup> The depreciation rate declines:

$$\frac{1-.05}{20} = \frac{.95}{20} = 4.75\%$$

18 This is called a "whole life" rate because it is based on the whole life of 20 years.

19 To develop the remaining life rate, we must identify some additional points of data: the

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<sup>4</sup> For a complete discussion of Iowa Curves, see Appendix A, part 3 of *Public Utility Depreciation Practices*, National Association of Regulatory Utility Commissioners, August 1996.

<sup>5</sup> This example is only to illustrate basic principles. As I explain in the next section, there are primarily *groups* of assets rather than a single asset, with each asset group assigned to an account. Thus, this example is not illustrative of how depreciation is actually calculated in current practice.

original cost of the asset, the depreciation reserve (the amount of depreciation that has already been recovered), and the remaining life of the asset.

In this illustration, let us assume that the asset originally cost \$1 million and that past depreciation charges have recovered \$400,000. This means that we have yet to recover \$600,000 in original cost less 5 percent positive salvage, or \$50,000. The total amount yet to be recovered is thus \$550,000. Let us further assume that the asset is 10 years old, leaving 10 years of remaining life. In remaining life depreciation, the unrecovered amount is divided by the remaining life:

$$\frac{\$550,000}{10 \text{ years}} = \$55,000 \text{ required annual accrual}$$

The depreciation rate is then calculated by dividing the annual amount to be recovered by the gross investment, in this case:

$$\$55,000 / \$1,000,000 = 5.5\%$$

#### IV. PLANT SERVICE LIFE

**Q. PLEASE DEFINE “AVERAGE SERVICE LIFE” AS IT IS USED IN UTILITY DEPRECIATION CALCULATIONS.**

A. The “average service life” for a given account is a projection of the number of years that a new unit of plant can be expected to remain used and useful on average. This concept is useful because modern depreciation utilizes what is called “group depreciation.” That is, rather than depreciate the value of an individual unit or units over the lifetime of those units, the value of a collection of units all together is depreciated. This group depreciation assumes that many units in each account will be retired at earlier ages, and thus have shorter

1 than average lives, and many units will retire at later ages, and thus have longer than  
2 average lives. Average service life is used to calculate the average remaining life, which,  
3 in turn, is the denominator in the calculation of depreciation expense. Group depreciation  
4 is also why the lives of units in an account are not studied, but rather, one analyzes the lives  
5 of dollars in these accounts.

6 **Q. DOES THE LENGTH OF A UTILITY PLANT'S SERVICE LIFE AFFECT**  
7 **RATES?**

8 A. Yes. As a general matter, shorter service life estimates for utility plant result in higher  
9 depreciation rates and expense for customers.

10 **Q. PLEASE DESCRIBE THE PROPER WAY TO DETERMINE THE AVERAGE**  
11 **SERVICE LIFE COMPONENT OF DEPRECIATION RATES.**

12 A. I have analyzed AESI's distribution accounts using an actuarial life analysis process called  
13 the Retirement Rate method. Actuarial methodologies were developed initially in the 17th  
14 and 18th centuries, primarily by life insurance companies that needed a mathematical  
15 means of estimating the mortality risk of individuals over a long period of time. This  
16 resulted in the development of "life tables" that show the mortality risk of a group of  
17 individuals with similar risk factors at each age.

18 The Retirement Rate method is an actuarial technique used to study plant lives,  
19 much like the actuarial techniques used in the insurance industry to study human lives. It  
20 requires a record of the dates of placement and retirement for each asset studied.  
21 Retirement data that contains this date of placement and retirement is referred to as "aged  
22 data" because it tells the analyst the age of the plant at the time it was retired. The

1 Retirement Rate method is the most sophisticated of the statistical life analysis methods  
2 because it relies on the most refined level of data.

3 The Retirement Rate method uses (1) the aged retirement data as described in the  
4 previous paragraph and (2) total plant in service at a given age (referred to collectively as  
5 “exposures”) from a company’s records to construct an “observed” or “original life table”  
6 (“OLT”). I discuss the composition of an observed life table in detail below. Observed  
7 life tables are important because they result in data points showing the percentage of a  
8 given unit of plant that is expected to survive to a given age. The actuarial analysis smooths  
9 and extends the OLT by pairing it with one of a family of 31 standardized survivor curves,  
10 which are the Iowa curves that I previously mentioned. The curve-fitting uses the least  
11 squared differences approach to find a best fit life for each curve. The “sum of least squared  
12 difference” is a common means of fitting curves (in this case the Iowa curves) to a set of  
13 data (in this case the observed life table data). The difference between each point of data  
14 and a point on a line is squared,<sup>7</sup> and the square of all those differences is summed to  
15 provide the total difference between the set of data and the line. The line that produces the  
16 least difference from the set of data is considered the “best fit.” The purpose of squaring  
17 the difference is to ensure that negative differences contribute to the overall difference  
18 rather than canceling out positive differences.

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<sup>7</sup> “Square” in mathematics means you multiply a quantity by itself. This quantity can be a number, variable or even an algebraic expression. When you square a number, the answer will always be positive; thus, the product of a negative number multiplied by another negative number equals a positive number. Squaring is the same as raising to the power 2, and is denoted by a superscript 2; for instance, the square of 3 may be written as 3<sup>2</sup>, which is the number 9.



1 Numerous iterative calculations are required for a Retirement Rate analysis. In the  
2 end, the analysis produces a life and Iowa curve best fit for a single average vintage.  
3 However, finding a mathematical best fit is only the beginning of the process of  
4 determining the most appropriate average service life and remaining life curve for a given  
5 account.

6 **Q. CAN YOU EXPLAIN THE ROLE OF INFORMED JUDGMENT IN**  
7 **DETERMINING THE APPROPRIATE SERVICE LIFE FOR AN ACCOUNT?**

8 A. The term ‘informed judgment’ is what is used by NARUC’S “*Public Utility Depreciation*  
9 *Practices*”, August 1996, (“*Depreciation Practices*”) to incorporate a number of different  
10 factors of consideration for a depreciation expert in determining appropriate depreciation  
11 parameters:

- 12 1. Observable trends reflected in historical data,
- 13 2. Potential changes in the type of property installed,
- 14 3. Changes in the physical environment,
- 15 4. Changes in management requirements,
- 16 5. Changes in government requirements, and
- 17 6. Obsolescence due to the introduction of new technologies.<sup>8</sup>

18 So, in the first place, we can see the very first factor that is intended to be incorporated into  
19 informed judgment is, in fact, the historical analysis of the data.

20 On the importance of informed judgment, *Depreciation Practices* states:

21 The use of informed judgment can be a major factor in forecasting. A logical  
22 process of examining and prioritizing the usefulness of information must be  
23 employed, since there are many sources of data that must be considered and  
24 weighed by importance. For example, the following forces of retirement  
25 need to be considered: Do the past and current service life dispersions  
26 represent the future? Will scrap prices rise or fall? What will be the impact  
27 of future technological obsolescence? Will the company be in existence in

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<sup>8</sup> National Association of Regulatory Utility Commissioners, “Public Utility Depreciation Practices”, August 1996, at 128.

1 the future? The analyst must rank the factors and decide the relative weight  
2 to apply to each. The final estimate might not resemble anyone of the  
3 specific factors; however, the result would be a decision based upon a  
4 combination of the components.<sup>9</sup>

5 This makes clear that it is, and should be, impossible to separate the process of determining  
6 appropriate depreciation parameters from the subjective factors that a depreciation expert  
7 must consider, above and beyond the mathematical analysis.

8 However, it is important to recognize that, in addition to the historical analysis  
9 being the first point incorporated in informed judgment, *Depreciation Practices* discussion  
10 of informed judgment should be viewed in its full context. The section of *Depreciation*  
11 *Practices* entitled, “Informed Judgment” comprises just over one page of a twenty page  
12 section on the technical interpretation of actuarial analysis, and indeed, in the context of a  
13 publication that is over three-hundred and fifty pages, and substantially dedicated to the  
14 various modes of mathematical analysis considered appropriate for the analysis of  
15 historical data and the mathematical projection of historical trends into the future. The  
16 informed judgement section of the *Depreciation Practices* is intended to provide  
17 additional context of when additional adjustments may be necessary outside of the  
18 historical life analysis. However, it is important to note that the basis for almost the entirety  
19 of the *Depreciation Practices* is focused on the interpretation of and outcome of the  
20 statistical analysis, which is the foundation for the study.

21 **Q. PLEASE FURTHER EXPLAIN IOWA CURVES.**

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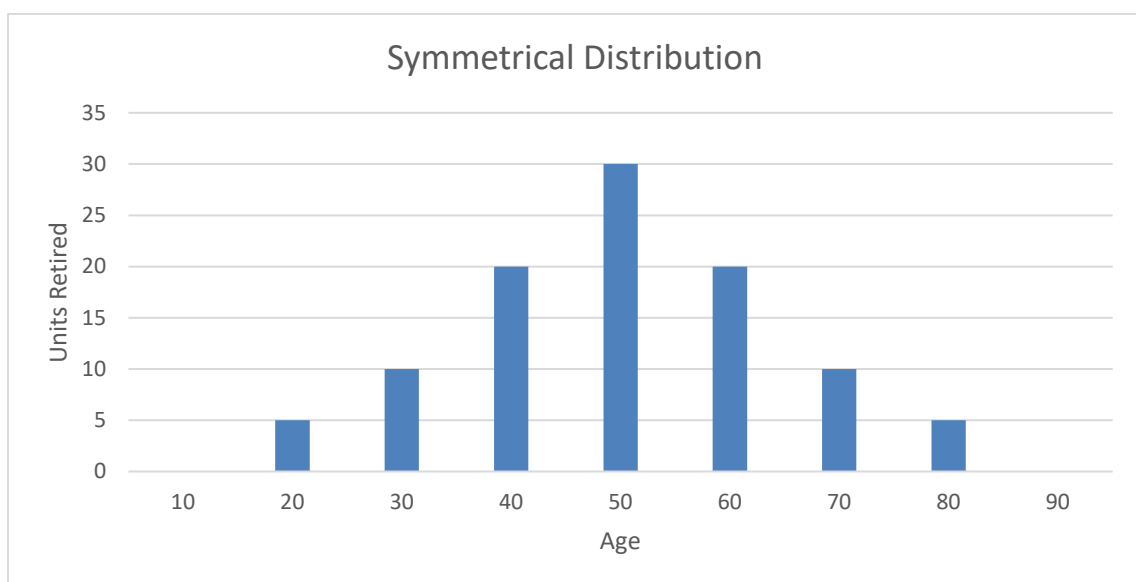
<sup>9</sup> *Id.* at 129.

A. An Iowa curve is a surrogate or standardized “OLT” based on a specific pattern of retirements around an average service life. An “OLT” is a table listing the percent surviving (in other words, the “observed life”) of a common class of assets, as of a particular calendar year. The Iowa curves are standardized OLTs that provide a set of standard patterns of retirement dispersion. Retirement dispersion recognizes that accounts are comprised of individual assets or units having different lives. Each curve represents a probability distribution and has a series of attributes. The curves are helpful in a variety of ways, including:

- To make realistic forecasts of the remaining useful life of groups of assets.
- To assist in anticipating the potential failure and functional failure of assets.

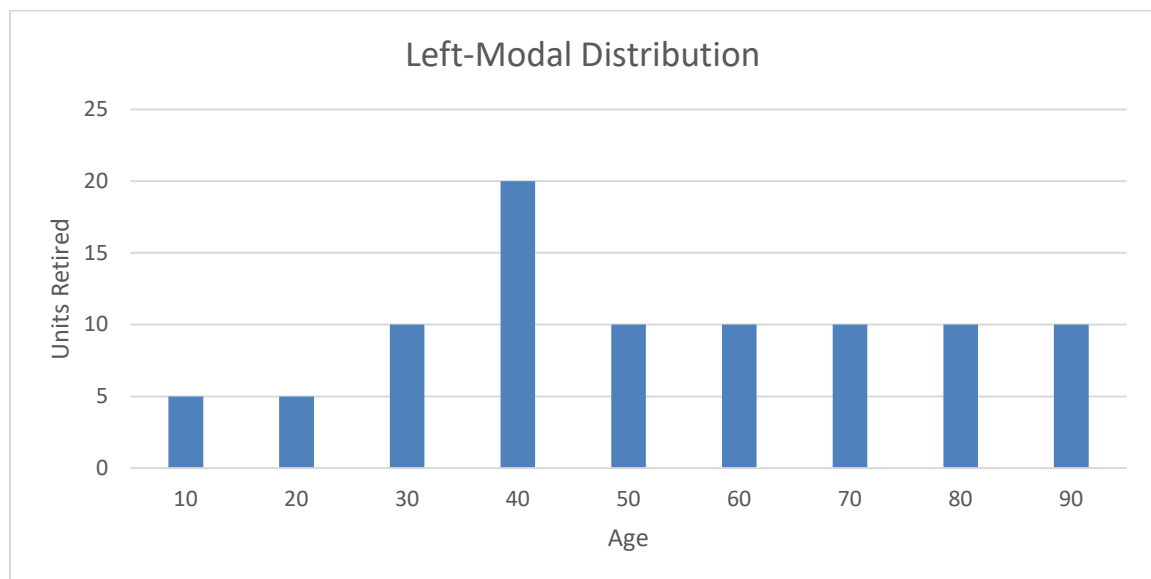
For example, imagine an account that begins with a new addition of one hundred units. These units are unlikely to all retire at the same time. Rather, different units within the group will retire at different times. Represented graphically, the result might appear as follows:

**Graph JSG-1**



Iowa curves describe many different patterns of dispersions. Returning to our example, imagine a different pattern of retirements as follows:

### Left-Modal Distribution



In this example, the average service life is still fifty, but the dispersion characteristics are very different. The mode (again, the highest number of retirements) is at age 40, which is an earlier age than the average, and overall, the distribution of retirements is more spread out than in the previous example. By using different types of

1 Iowa curves, an expert can capture these different retirement characteristics evident in  
2 retirement data.

3 One way that Iowa curves illustrate these different patterns is by their orientation  
4 as left-skewed (“L curves”), symmetrical (“S curves”) or right-skewed curves (“R curves”).  
5 The letters describe the location of the “mode,” as discussed above, relative to the average  
6 service life. Hence, in the first example, I would use an “S curve” because the number of  
7 retirements is relatively equal on both sides of the mode. In the second example, however,  
8 in which the mode falls before the average service life (that is, the mode falls at a younger  
9 age than the average service life), I would use an “L curve.” If the mode were to fall after  
10 the average service life, then I would use an “R curve.”<sup>10</sup>

11 In addition to the letter that describes the location of the mode (e.g., L curve), Iowa  
12 curves are numbered zero (0) through six (6). The numbering identifies the spread of the  
13 retirement dispersion. Lower numbers represent a wider retirement dispersion while higher  
14 numbers represent a narrower dispersion. Referring to the first example above, in which  
15 the retirements were more tightly grouped around the average service life, a higher number  
16 would be used, whereas in the second example in which the retirements were more diffuse,  
17 a lower number would be used.

18 To combine these two concepts, an appropriate Iowa curve for the first example  
19 might be an S5, where the “S” indicates a symmetrical curve to either side of the mode and  
20 the 5 indicates a relatively narrow dispersion of retirements. In contrast, for the second

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<sup>10</sup> In addition to L, S and R curves, there is a set of Origin Modal, or “O curves,” which are so called because the mode for these curves is at age one, or the “origin.” Generally speaking, O-shaped Iowa curves are not appropriate for utility plant, although one of them in this particular instance is required.

1 example, the data indicate a more likely curve of L2, with an “L” because the mode falls  
2 before the average service life and a “2” because there is a relatively wider retirement  
3 dispersion. This combination of one letter and one number defines a dispersion pattern.  
4 Adding an average service life to an Iowa curve (*e.g.*, 5-S0, where the “5” represents a  
5 five-year average service life) provides a survivor curve intended to depict a reasonable  
6 expectation of how a group of assets will survive, or conversely be retired, over the  
7 expected average service life.

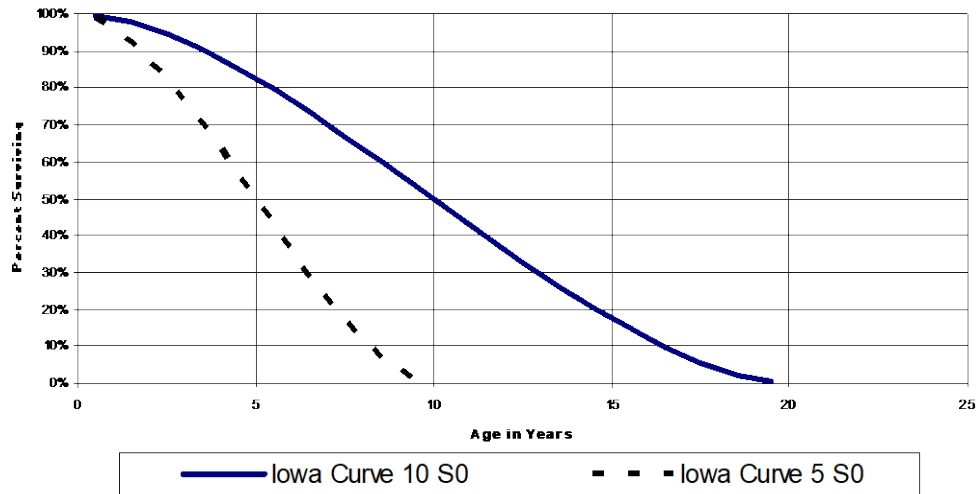
8 Table JSG-2 below compares curves with the same shape (S0) but different average  
9 service lives (5 and 10 years) to illustrate different iterations with the same curve. The  
10 percent surviving represents the amount of plant surviving at each age interval shown in  
11 the first column. The 5-S0 life and curve sums to the five-year average service life, while  
12 the 10-S0 life and curve sums to a ten-year average service life.

**Table JSG-2**  
**Sample Survivor Curves**

<u>Age</u>	<b>5-S0 Curve</b> <u>Percent Surviving</u>	<b>10-S0 Curve</b> <u>Percent Surviving</u>
0.5	0.99	1.00
1.5	0.92	0.98
2.5	0.83	0.94
3.5	0.70	0.90
4.5	0.57	0.85
5.5	0.43	0.80
6.5	0.30	0.74
7.5	0.17	0.67
8.5	0.08	0.60
9.5	<u>0.01</u>	0.53
10.5		0.47
11.5		0.40
12.5		0.33
13.5		0.26
14.5		0.20
15.5		0.15
16.5		0.10
17.5		0.06
18.5		0.02
19.5		<u>0.00</u>
<b>Total</b>	<b>5.00</b>	<b>10.00</b>

These are called “curves” because, when plotted on charts with the x-axis representing “age” and the y-axis representing “percent surviving,” they appear as shown below in Graph JSG-3:

1

**Graph JSG-3****Example of Same Curve With Different Lives**

2 **Q. HOW ARE IOWA CURVES USED IN SERVICE LIFE ANALYSIS?**

3 A. The purpose of Iowa curves is to enable the calculation of an average remaining life.  
 4 Remaining life calculations take the current age of each vintage within an account and then  
 5 use the retirement rate projected by the appropriate Iowa curve to project the remaining life  
 6 of each of these vintages of plant. Ultimately, depreciation accruals for plant investment  
 7 are calculated from remaining lives, so it is important to select the correct average service  
 8 life and the correct Iowa curve.

9 **Q. IS IT NECESSARY TO FIT ALL OF THE AVAILABLE DATA POINTS TAKEN**  
 10 **FROM THE OBSERVED LIFE TABLE?**

11 A. No. In some cases, it is appropriate to disregard some or even many of the oldest aged  
 12 data. This is because actuarial data the Company keeps is often tied to long-lived assets  
 13 that represent such a small percentage of the total plant as to not be statistically significant  
 14 or represent accounting anomalies, such as retirements that were never recorded. This



1 process is called a “T-cut.” While there is no hard and fast rule for where a T-cut is  
2 required, it is generally appropriate to make a T-cut where the remaining retirement data  
3 diverges materially from the established pattern of retirements seen to that point.

4 The decision to make a T-cut, and at what point in the data set to make the cut, is  
5 one of the most important yet most subjective elements to an actuarial analysis. In most  
6 cases, making a larger T-cut (that is, one that results in fitting the curve to less of the  
7 actuarial data) will result in a shorter estimated average service life because the data  
8 eliminated is for the longest-lived assets in the set of data. Therefore, as explained above,  
9 a larger T-cut and the resulting shorter estimated average service life will tend to increase  
10 customer rates.

11 Additionally, an inconclusive analysis may occur if a larger T-cut eliminates data  
12 points from an observed life table with a limited data set (that is, an account that has a short  
13 history of plant exposed to retirement). Typically, the portion of an Iowa curve between  
14 85% surviving and 15% surviving most distinguishes one curve from another. Apart from  
15 O curves, Iowa curves follow a parabolic distribution of retirements. That is, as discussed  
16 above, they tend to have limited retirements at the beginnings and ends of their lives. The  
17 portion of the curve between 85% and 15% of surviving plant is the most indicative of the  
18 appropriate curve shape because that portion of the curve is when the bulk of retirements in  
19 a given account happen, and where variation in the pattern of retirements tends to occur. If  
20 a T-cut eliminates a portion of the observed life table survivor data between 85% and 15%  
21 surviving, the matching of that data to an Iowa curve will be more likely to produce  
22 ambiguous and misleading results. The full set of aged data should be generally used in the  
23 service life analysis unless specific circumstances warrant exclusion of the data.

**V. COMPARISON OF THE EQUAL LIFE GROUP (“ELG”) PROCEDURE AND  
AVERAGE LIFE GROUP (“ALG”) PROCEDURE**

**Q. WHAT ARE ‘GROUP’ PROCEDURES AS PERTAINING TO THE  
CALCULATION OF REMAINING LIVES?**

A. Remaining life grouping procedures are the methods by which subsets of plant with similar life characteristics are bundled together for the purpose of determining the recovery period over which the remaining plant investment should be recovered. Different procedures group the plant differently, and so arrive at different recovery periods at any given point in time.

**Q. WHAT IS THE DIFFERENCE BETWEEN THE ELG PROCEDURE AND ALG  
PROCEDURE FOR CALCULATING REMAINING LIVES?**

A. The principle difference between the two procedures is that the ALG procedure assumes that all units within a particular group, typically a vintage, will share an average life.<sup>11</sup> The distribution of retirements is then determined using a weighting procedure across all of the vintages. The ELG procedure incorporates the Iowa curve distribution of retirements within each vintage. This allows the projected shortest-lived assets within each vintage to retire simultaneously across all vintages.

**Q. WHAT IS THE EFFECT OF USING ALG VS. ELG REMAINING LIFE  
PROCEDURES?**

A. The direct effect of using ELG as opposed to ALG is that depreciation rates are always going to be higher earlier on in the life cycle of a particular group of plant, and lower later

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<sup>11</sup> A ‘vintage’ refers to all of the plant placed into service in a given year.

in the life cycle of that plant. The following table has been excerpted from NARUC'S  
*Depreciation Practices*, page 178:

**EFFECT OF DIFFERENT PROCEDURES ON  
DEPRECIATION RATES AND ACCRUALS**

<i>Activity Year</i>	<i>ELG</i>		<i>VG</i>	
	<i>Depreciation</i>		<i>Depreciation</i>	
	<i>Rate</i>	<i>Accruals</i>	<i>Rate</i>	<i>Accruals</i>
<i>1987</i>	<i>45.7%</i>	<i>\$22,850</i>	<i>33.3%</i>	<i>\$16,650</i>
<i>1988</i>	<i>33.4</i>	<i>40,040</i>	<i>25.9</i>	<i>31,080</i>
<i>1989</i>	<i>27.1</i>	<i>54,280</i>	<i>21.9</i>	<i>43,730</i>
<i>1990</i>	<i>21.1</i>	<i>35,940</i>	<i>21.4</i>	<i>36,360</i>
<i>1991</i>	<i>18.0</i>	<i>25,170</i>	<i>20.7</i>	<i>28,990</i>
<i>1992</i>	<i>15.8</i>	<i>17,350</i>	<i>19.7</i>	<i>21,620</i>

The table above illustrates that variation over just a short period of activity years, the degree to which depreciation rates will be higher in earlier years and lower in later years. This variation will be greater for longer average service life plant, and the more newer plant investment is made.

Over the life of any given unit of plant, the net effect of the difference between the two procedures is zero. Both procedures recover the full amount of the investment over the service life of the investment. However, de facto, the use of ELG is a form of accelerated depreciation. The ELG method potentially better reflects the actual retirement patterns of a group of assets with different vintages at specific point in time, but requires constant updating to remain accurate.

1 **Q. WHAT ARE THE ADVANTAGES AND DISADVANTAGES OF THE TWO**  
2 **PROCEDURES?**

3 A. The first and arguably most significant disadvantage of the ELG procedure is the  
4 administrative burden it puts on the Commission. The fact that the ELG shifts a greater  
5 portion of the depreciation expense toward the beginning of the life of particular unit of  
6 plant means that depreciation expense fluctuates substantially over the life of the plant.<sup>12</sup>  
7 In order to ensure that the depreciation expense is accurate from year to year, remaining  
8 life calculations must be updated regularly, and companies must be obliged to submit  
9 regular depreciation studies.

10 The reason that it is necessary to closely monitor and update depreciation rates  
11 using ELG is that, should a company's remaining lives be left without being updated for  
12 more than a few years, then the "accelerated" depreciation rates may not be accurately  
13 accounted for at the time of the utility's next rate increase request, and ratepayers end up  
14 paying those accelerated depreciation rates or for return on an understated depreciation  
15 reserve when new rates are set, when ratepayers have already paid depreciation expense  
16 during a period when depreciation rates are higher under the ELG procedure.

17 In addition to these issues, there is an underlying reality about utility plant recovery  
18 costs which is, due to inflation and the ever-growing infrastructure needs of running a  
19 electric utility, plant grows significantly each year. This means a very substantial portion  
20 of any given utility's plant is perpetually stuck in the "accelerated" portion of the recovery

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<sup>12</sup> National Association of Regulatory Utility Commissions *Public Utility Depreciation Practices*, pg. 63, "ELG may be expected to produce greater fluctuations in depreciation expense from year to year than the broad group procedure."

1 curve created by the use of ELG rates. The net effect of these factors is that the ELG  
2 remaining life procedure results in ratepayers paying more in depreciation expense in  
3 perpetuity, provided the utility's plant continues to grow at a consistent rate.

4 In contrast, ALG rates do not attempt to as closely mimic the actual retirement rate  
5 of individual vintages, but in doing so, this creates a smoother recovery of costs which  
6 may, in the end, more closely map to the retirement rate of the utility's plant overall.  
7 Because the remaining life remains more constant over the life of each unit, there is no  
8 need to perform annual updates to the company's remaining lives, and utilities can wait  
9 intervals of five years or more between performing depreciation studies, which reduces  
10 costs to ratepayers over time.

11 **Q. HAS THE COMMISSION OPINED ON THE MERITS OF ALG V. ELG**  
12 **REMAINING LIFE PROCEDURE?**

13 A. Yes. In Cause No. 45253, the Commission stated:

14 First, with respect to the question of whether the ELG or ALG method  
15 should be used, we find the evidence presented by OUCC witness Mr.  
16 Garrett and Industrial Group witness Mr. Andrews persuasive, as both  
17 witnesses showed that the ELG method results in unreasonably high  
18 depreciation rates. ALG depreciation rates result in systematical and  
19 rational cost recovery with near term customer rate relief and full cost  
20 recovery of utility investments. While we have determined in the past that  
21 the ELG methodology was appropriate and acknowledge the weight given  
22 to precedent in many prior decisions, we always evaluate each case as it  
23 comes before us and do not need to approve the same methodology based  
24 on prior decisions, especially in light of a changed landscape. The use of  
25 ELG in a higher than average investment cycle has the effect of  
26 unnecessarily increasing the near term depreciation expense as compared to  
27 the use of ALG.<sup>13</sup>  
28

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<sup>13</sup> *Duke Energy Ind., LLC*, Cause No. 45259, 90 (Ind. Util. Regul. Comm'n June 29, 2020).

1 Ultimately, the Commission concluded:

2 Therefore, we find that the application of ALG serves as a reasonable  
3 regulatory mechanism to provide rate impact moderation while not limiting  
4 DEI's reasonable recovery of its investment.<sup>14</sup>  
5

6 **Q. WHAT DO YOU RECOMMEND REGARDING AESI'S REMAINING LIFE**  
7 **PROCEDURES?**

8 A. I recommend AESI continue using the ALG procedure for calculating remaining lives. The  
9 ALG procedure better fits the actual ongoing investment and retirement patterns of utility  
10 plant overall, and requires significantly less administrative upkeep by utilities and less  
11 oversight by the Commission.

12 **VI. ADJUSTMENTS TO SERVICE LIFE AND NET SALVAGE PARAMETERS FOR**  
13 **TRANSMISSION AND DISTRIBUTION**

14 **Q. PLEASE DISCUSS YOUR APPROACH TO ANALYZING MR. SPANOS'**  
15 **SERVICE LIFE PROPOSALS.**

16 A. In general, I begin the analysis of a given account by first reviewing the OLT to see the  
17 distribution of exposures over time. This is primarily to check for any irregularities in the  
18 exposure data. Generally speaking, it is best to give equal weight to different ages,  
19 regardless of exposure amount. With that said, in extreme cases, magnitude of exposures  
20 may inform the subjective weight given to different periods of exposures.

21 Next, I review the mathematical curve-fitting routines Mr. Spanos provided in an  
22 attachment to the response to OUCC data request ("DR") 26-10. Taking into consideration  
23 the range of fit utilized and the way that data selection impacts the results, I then identify

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<sup>14</sup> *Id.*

1        what the best mathematical fit to the historical retirement data is. Then, taking into  
2        consideration my experience and informed judgement to apply numerous factors,  
3        including, but not limited to, the specifics of the historical data, the type of plant in  
4        question, and the maturity of the retirement data, I determine whether the mathematical  
5        best fit life and curve are within the range of reasonable expectations. Based on this curve-  
6        fitting analysis, I will then identify the best-fitting life and curve that is appropriate to the  
7        type of plant in question. This process of identifying the best-fitting curve shape to the  
8        data available is the beginning of the life-curve selection process.

9                Once a best-fitting curve to the data has been identified, I will review the full range  
10       of information provided by Mr. Spanos and other AESI witnesses pertaining to future  
11       expectations of the service life for the account being reviewed. This would include notes  
12       from Mr. Spanos on management interviews and site visits, company-provided information  
13       on future plans and projects, reasonably anticipated upcoming technological changes in the  
14       type of plant in question, and the experience of other utilities in the region and industry at  
15       large. To that end, I have reviewed AESI's responses to DRs aimed at gathering  
16       information about Mr. Spanos' life and net salvage proposals. Among these are responses  
17       to OUCC DR 26-8, which requested Mr. Spanos' notes on plant visits and interviews with  
18       AESI management, IG 2-1, which requested industry statistics Mr. Spanos reviewed in  
19       arriving at his selections, and OUCC DR 26-12, which requested information relevant to  
20       AESI's plans for future retirements, to which the Company responded with its most recent  
21       Integrated Resource Plan. Finally, I reviewed Section III of Attachment JJS-1, labeled  
22       "Service Life Considerations," in which Mr. Spanos states:

1           The service life estimates were based on informed judgment which  
2           considered a number of factors. The primary factors were the statistical  
3           analyses of data; current Company policies and outlook as determined  
4           during conversations with management; and the survivor curve estimates  
5           from previous studies of this company and other electric companies.

6           Unfortunately, Mr. Spanos has not elected to provide specific discussion of his rationale  
7           for his selection of specific average service lives or net salvage percentages for accounts  
8           other than Account 367 – Underground Conductors and Devices and Account 365 –  
9           Overhead Conductors and Devices. Therefore, I relied on my own informed judgment,  
10          taking all available information into consideration.

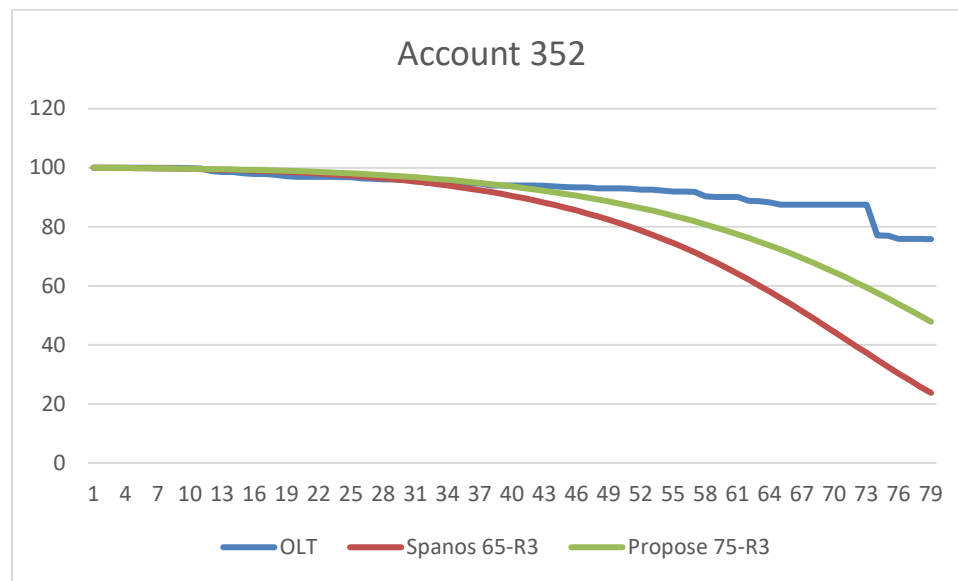
11   **Q.    COULD YOU PLEASE DISCUSS, IN DETAIL, EACH SERVICE LIFE**  
12   **ADJUSTMENT YOU ARE PROPOSING?**

13   A.    Yes, the following are my notes on adjustments I made to the average service lives of each  
14          account for which I am proposing adjustments. In these notes, I make extensive reference  
15          to AESI Attachment JJS-1, section VII, which contains Mr. Spanos' life analysis. When I  
16          refer to a page of his life analysis, please understand I am referring to the life analysis for  
17          that account shown in section VII of Attachment JJS-1. Similarly, I will be making  
18          extensive reference to the attachment provided in response to OUCC DR 26-10, which  
19          contains Mr. Spanos' mathematical curve-fitting results. When I refer to the results of Mr.  
20          Spanos' curve-fitting routine, please understand I am referring to the relevant account's  
21          curve-fitting results in this attachment.



1

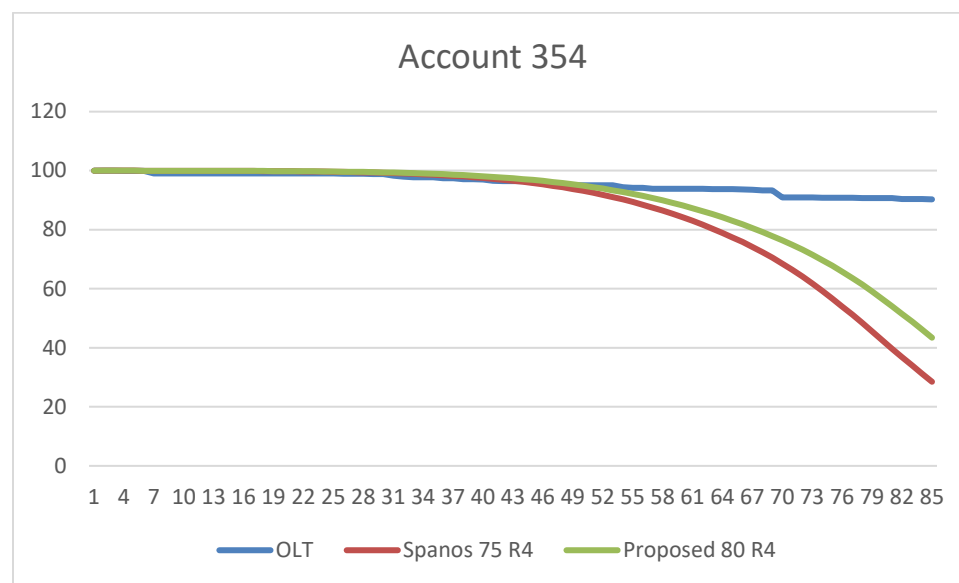
**Graph JSG-4**



2        Account 352: For account 352 – Structures and Improvements, Mr. Spanos selected a 65-  
3        R3 life and curve. Reviewing the graph provided in Mr. Spanos’ life analysis at page VII-  
4        49, we can see Mr. Spanos’ selected curve is not a particularly good fit to the available  
5        data. The graph shows the Company’s retirement data has experienced retirements at a  
6        significantly lower rate than predicted by the curve Mr. Spanos proposed. As expected, the  
7        results of Mr. Spanos’ curve-fitting routine are indicative of a significantly longer service  
8        life than Mr. Spanos proposes. The life analysis does not contain sufficient retirements to  
9        give an adequate sense of a specific appropriate service life. However, historical analysis  
10       does show, based on the retirement rate of AESI’s plant, that 88.2% would be expected to  
11       last until age 63.5, which is the age at which Mr. Spanos ends his graph. This is simply  
12       not consistent with an average service life of 65 years with an R3 distribution, which  
13       predicts that less than 60% of plant would be surviving at age 63.5. Mr. Spanos’ notes and  
14       life analysis do not provide any specific information related to the Company’s plans for

1 this account. Mr. Spanos' provided industry statistics suggest a reasonable range of lives  
 2 between 50-80 years. This is consistent with my own knowledge of lives for transmission  
 3 structures. AESI's historical data is consistent with a service life towards the high end of  
 4 this range of lives. Therefore, I propose an average service life of 75 years, maintaining  
 5 Mr. Spanos' proposed R3 retirement dispersion curve.

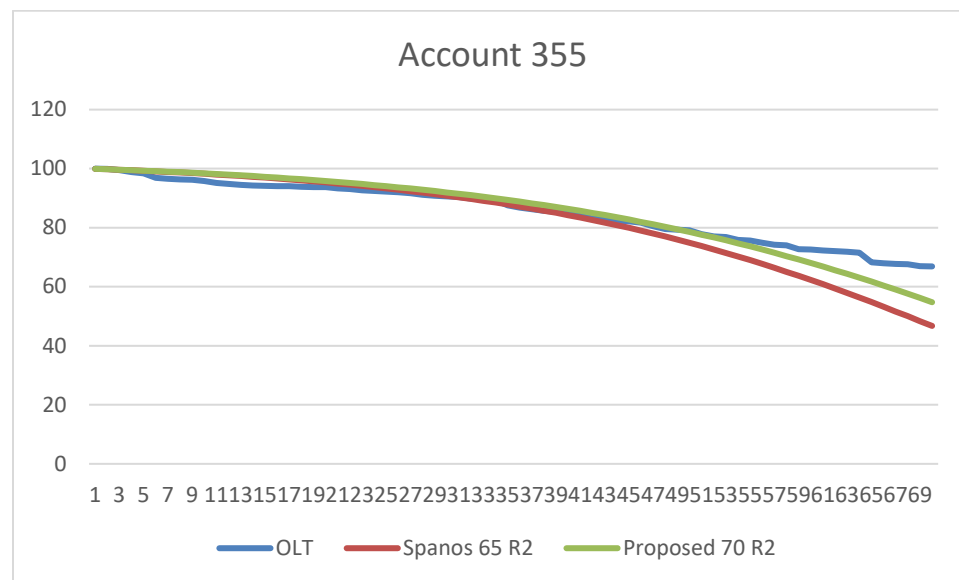
6 **Graph JSG-5**



7 Account 354: For account 354 –Towers and Fixtures, Mr. Spanos selected a 75-R4 life and  
 8 curve. Reviewing the graph provided in Mr. Spanos' life analysis at page VII-57, we can  
 9 see that Mr. Spanos' selected curve is not a particularly good fit to the available data. The  
 10 graph shows the Company's retirement data experienced retirements at a significantly  
 11 lower rate than predicted by the curve Mr. Spanos proposes. As expected, the results of  
 12 Mr. Spanos' curve-fitting routine are indicative of a significantly longer service life than  
 13 Mr. Spanos proposes. The life analysis does not contain sufficient retirements to give an  
 14 adequate sense of a specific appropriate service life. However, what the historical analysis

does show is, based on the retirement rate of AESI's plant, 90.1% would be expected to last until age 75.5, which is the age at which Mr. Spanos ends his graph. This is simply not consistent with an average service life of 75 years with an R3R distribution, which predicts less than 50% of plant would be surviving at age 75.5. Mr. Spanos' notes and life analysis do not provide any specific information related to the Company's plans for this account. Mr. Spanos' provided industry statistics suggest a reasonable range of lives between 50-80 years. This is consistent with my own knowledge of lives for transmission structures. AESI's historical data is consistent with a service life towards the high end of this range of lives. Therefore, I am proposing an average service life of 80 years, maintaining Mr. Spanos' proposed R4 retirement dispersion curve.

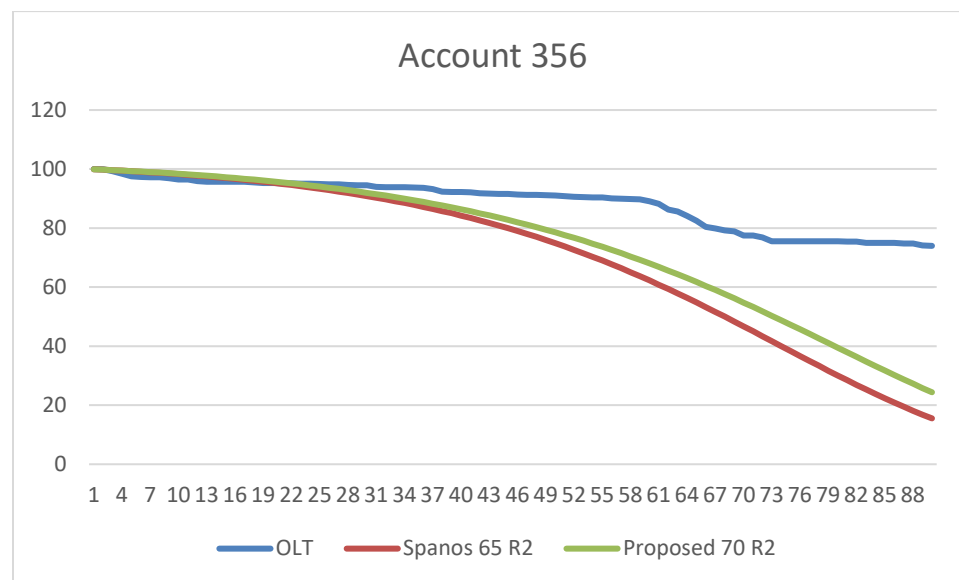
**Graph JSG-6**



Account 355: For account 355 – Poles and Fixtures, Mr. Spanos selected a 65-R2 life and curve. Reviewing the graph provided in Mr. Spanos' life analysis for this account on page VII-61, we can see that Mr. Spanos' selected curve is not a particularly good fit to the

1 available data. The 65-R2 life and curve fits reasonably well to the available data through  
2 age 42.5, at which point the data deviates substantially from the proposed curve. Mr.  
3 Spanos' curve-fitting routine shows that the best-fitting life and curve are an 84-R1. The  
4 industry data Mr. Spanos provided shows a typical range for service lives in this account  
5 from 55-70 years. This is broadly consistent with my own experience, although I have  
6 seen service lives for this account as high as 80 years or more. The historical life analysis  
7 is consistent with a longer service life than Mr. Spanos proposed and is consistent with the  
8 upper range of the lives found in the industry. I propose an average service life of 70 years  
9 while retaining Mr. Spanos' proposed R2 curve shape.

10 **Graph JSG-7**



11 Account 356: For account 356 – Overhead Conductors and Devices, Mr. Spanos selected  
12 a 65-R2 life and curve. Reviewing the graph provided on page VII-65 in Mr. Spanos' life  
13 analysis for this account, we can see Mr. Spanos' selected curve is not a particularly good  
14 fit to the available data. The life analysis does not contain sufficient retirements to give an

adequate sense of a specific appropriate service life. However, the historical analysis does show, based on the retirement rate of AESI's plant, 75.1% would be expected to last until age 78.5, which is the age at which Mr. Spanos' graph ends. This is not consistent with an average service life of 65 years with an R2 distribution, which predicts that just over 40% of plant would survive at age 78.5. The industry data Mr. Spanos provided shows a typical range for service lives in this account from 40-70 years. The historical life analysis is consistent with a longer service life than Mr. Spanos proposes and is consistent with the upper range of the lives found in the industry. I am recommending an average service life of 70 years while retaining Mr. Spanos' proposed R2 curve shape.

Net Salvage Adjustments:

**Q. WITH RESPECT TO UTILITY DEPRECIATION OF PLANT, WHAT IS NET SALVAGE AND WHO PAYS FOR IT?**

A. Net salvage is simply the salvage value the Company receives from its retired plant (typically called "gross salvage") minus the cost incurred in the process of removing or retiring that plant (typically called "cost of removal"). Although it is not always the case, typically the cost of removal greatly exceeds the gross salvage value and so net salvage is expressed as a negative number. Total future net salvage is then subtracted from future depreciation accruals resulting from recovery of the plant service value. Since net salvage is typically a negative number, this results in net salvage increasing depreciation expense, which is ultimately charged to ratepayers.

**Q. PLEASE EXPLAIN THE METHODOLOGY MR. SPANOS UTILIZED TO ANALYZE NET SALVAGE PERCENTAGES IN THIS CASE.**

1 A. The methodology Mr. Spanos uses in his analysis is the traditional method for evaluating  
2 net salvage that uses a ratio of net salvage over retirements. That ratio is applied to plant  
3 in service to arrive at an estimate of total future net salvage. The estimate of net future  
4 salvage is then allocated evenly over the remaining life of plant along with the recovery of  
5 the plant's service value.

6 **Q. DO YOU HAVE ANY GENERAL CONCERNS WITH THE APPROACH TO NET**  
7 **SALVAGE ANALYSIS MR. SPANOS PROPOSES IN THIS CASE?**

8 A Yes. The primary issue with the "traditional" net salvage methodology is that it compares  
9 values from two different periods, and therefore incorporates inflation in growth in net  
10 salvage over time and projects that growth out into the future. While this is theoretically  
11 reasonable in a situation where growth is expected to be consistent over time, that is not  
12 the case with net salvage.

13 Cost of removal, which is recorded at the dollar value at the time it occurs, has  
14 grown at a faster rate over the past 30 years than retirements, which are recorded at original  
15 cost at the time the related plant was put into service. This increase in cost of  
16 removal has occurred for reasons that can reasonably be assumed to be non-repeating,  
17 specifically related to changes to the accounting methods for recording cost of removal on  
18 replacement projects and regulatory requirements related to plant removal.

19 However, comparing historical cost of removal to retirements at their original cost  
20 results in excessive net salvage estimates using this "traditional" methodology. This can  
21 be seen from the fact that for numerous accounts, the net salvage percentage indicated by  
22 the historical analysis is significantly higher than those Mr. Spanos proposed.

1 **Q. PLEASE DISCUSS YOUR APPROACH TO MAKING ADJUSTMENTS TO NET**  
2 **SALVAGE PERCENTAGES FOR MASS PROPERTY ACCOUNTS IN THIS**  
3 **CASE.**

4 A. Generally, I review the historical net salvage analysis for the most recent five-year  
5 averages. When a net salvage percentage Mr. Spanos proposes is higher than the percentage  
6 indicated by the five-year average, I review other considerations such as the trend in net  
7 salvage percentages and any statements Mr. Spanos makes which might justify deviation  
8 from the historical analysis. If the deviation from the most recent five-year average net  
9 salvage is not justified, I will propose the most recent five-year average. In some cases,  
10 where the net salvage percentage indicated by the historical analysis is significantly lower  
11 than that Mr. Spanos proposes, a net salvage percentage at a mid-point between the two  
12 percentages may be proposed in the interest of moderation.

13 **VII. CONTINGENCY FACTORS FOR GROSS SALVAGE AND TERMINAL**  
14 **RETIREMENT COSTS**

15 **Q. WHAT IS THE COMPANY PROPOSING WITH REGARD TO CONTINGENCY**  
16 **COSTS?**

17 A AESI witness Paula Guletsky of Sargent and Lundy has prepared a decommissioning study  
18 which incorporates a 20% contingency factor on cost estimates for decommissioning the  
19 Company's generation units. AEPI applied a credit on gross salvage, this same 20%  
20 contingency is described as a discount and factored in as a contingency cost along with the  
21 other contingency cost calculations on other cost estimates.<sup>15</sup>

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<sup>15</sup> AESI Attachment PMG-1 page, 21 section 7.10.Contingency.

1 **Q. PLEASE EXPLAIN THE PURPOSE OF CONTINGENCY FACTORS IN THE**  
2 **CONTEXT OF DECOMMISSIONING STUDIES.**

3 A. The purpose of a contingency factor is simply to allow for unknown factors unaccounted  
4 for in the process of creating a cost estimate. Accordingly, one should expect the  
5 contingency factor to be included as part of a project would vary based on the stage of  
6 development of the project and the level of cost estimation detail.

7 **Q. WHAT ARE THE APPROPRIATE RANGES FOR CONTINGENCY FACTORS**  
8 **WHEN DEVELOPING A DECOMMISSIONING STUDY?**

9 A. In Ms. Guletsky's testimony, she states:

10 For an estimate that is to be used to establish a control budget, where the  
11 design is not complete, a contingency ranging from 15% to 30% is  
12 recommended. The contingency applied to the estimate is consistent with  
13 industry guidelines. Both the American Association of Cost Estimators  
14 (AACE) and the Electric Power Research Institute (EPRI) provide  
15 recommended ranges of contingency to be applied to cost estimates when  
16 establishing a control budget, AACE recommends 20% contingency and  
17 EPRI recommends a range of 15% to 30%. Contingency is applied to all  
18 cost estimates. The appropriate amount of contingency to apply decreases  
19 as the project definition increases.<sup>16</sup>

20 As indicated here, the appropriate level of contingency factor depends on the stage  
21 of the project and "project definition increases." Therefore, the discussion about the  
22 appropriate level of contingency factor is really a discussion of the level of detail of the  
23 study, and stage of the project's definition.

24 The following table comes from an article entitled "Cost Contingency as the  
25 Standard Deviation of the Cost Estimate:"<sup>17</sup>

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<sup>16</sup> Guletsky Direct, Page 17, line 10-18.

<sup>17</sup> 'Cost Contingency as the Standard Deviation of the Cost Estimate' by Geoffrey Rothwel, PhD, appearing in Cost Engineering Journal, Vol. 47, No. 7, July 2005.



AACE International Project Stage	AACE International Expected Accuracy Range L=Low, H=High	AACE International Suggested Contingency	EPRI Project Stage	EPRI Suggested Contingency
Concept Screening	L: -20% to -50% H: +30% to +100%	50%	NA	NA
Feasibility Study	L: -15% to -30% H: +20% to +50%	30%	Simplified Estimate	30-50%
Authorization or Control	L: -10% to -20% H: +10% to +30%	20%	Preliminary Estimate	15-30%
Control or Bid/Tender	L: -5% to -15% H: +5% to +20%	15%	Detailed Estimate	10-20%
Check Estimate or Bid/Tender	L: -3% to -10% H: +3% to +15%	5%	Finalized Estimate	5-10%
<i>Sources: Association for the Advancement of Cost Engineering International [1] and EPRI [2]</i>				

Table 1— Comparison of AACE International and EPRI Cost Estimate Stages

As shown in the above table, the range of contingency factors varies quite a bit more than suggested by Ms. Guletsky, ranging from 5% at the point of a finalized estimate, to 50% at the point of a very preliminary or simplified estimate. Ms. Guletsky's proposed 20% contingency factor is consistent with an "Authorization" or "Control" stage for Association for the Advancement of Cost Engineering ("AACE") estimation, or at the middle range for a "preliminary estimate" for the Electric Power Research Institute ("EPRI"), or the high end of the range for a detailed estimate.

**Q. IS MS. GULETSKY'S PROPOSED 20% CONTINGENCY FACTOR APPROPRIATE, BASED ON THESE STANDARDS?**

**A.** No. Preliminarily, in my experience, the typical range of contingency factors used for decommissioning cost estimates conforms to the EPRI standards, typically ranging from

1 5% to 20%. This certainly makes sense, as EPRI's estimates are specific to electric utility  
2 plant, as opposed to the AACE estimates, which are more general. I have never reviewed  
3 a decommissioning study for electric or gas plant that used a contingency factor over 20%.  
4 This accurately reflects the reality of decommissioning studies in this context, which is that  
5 they are not performed in isolation for the sole purpose of arriving at appropriate  
6 depreciation rates, but are also used as the basis for reviewing bids for projects.

7 To Ms. Guletsky's credit, the decommissioning studies Sargent and Lundy  
8 prepared are highly detailed studies based on specific considerations of each plant, detailed  
9 estimations of labor, construction and equipment and scrap highly specific to each plant  
10 studied. The study factors in precise estimates associated with labor, materials, scrap,  
11 construction equipment, subcontract costs, and detailed assessments of indirect costs. This  
12 effectively reduces the possible areas that are unaccounted for by the estimate, reducing  
13 the need for a higher contingency cost. As such, the appropriate contingency factor used  
14 should be closer to the range appropriate for finalized estimates. According to EPRI, 5%  
15 to 10%, as shown from the table above, is more appropriate.

16 **Q. DO YOU HAVE ANY OTHER ISSUES WITH MS. GULETSKY'S**  
17 **CONTINGENCY FACTOR?**

18 A. Yes. Due to the way Ms. Guletsky calculated contingency factors by component, the actual  
19 contingency cost factored into the total project cost estimates is actually higher than 20%  
20 for all projects and considerably higher for some.<sup>18</sup>

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<sup>18</sup> Values taken from AES Indiana Attachment PMG-1, page 13, Table 5.2, "Cost Less Contingency" and "Contingency as a percentage of Cost less Contingency" calculated separately.

**Table JSG-3**

	<b>Contingency</b>	<b>Total Project Cost</b>	<b>Cost less Contingency</b>	<b>Contingency as a percentage of Cost less contingency</b>
<b>Eagle Valley Coal</b>	\$22,801,400	\$136,776,176	\$113,974,776	20.01%
<b>Eagle Valley CCGT</b>	\$4,523,300	\$17,228,159	\$12,704,859	35.60%
<b>Harding Street</b>	\$35,403,100	\$170,737,229	\$135,334,129	26.16%
<b>Petersburg</b>	\$75,966,800	\$376,181,618	\$300,214,818	25.30%
<b>Georgetown</b>	\$1,191,400	\$5,321,064	\$4,129,664	28.85%

Whatever has led to this excessive contingency cost as a percentage of the total project cost should not continue – contingency costs this high relative to the total project cost are not appropriate.

**Q. WHAT ARE YOU PROPOSING FOR A CONTINGENCY FACTOR ON REMOVAL COSTS?**

A. I am conservatively proposing a 10% contingency factor be used for retirement costs, consistent with the low end of the range for “detailed estimates” and the high end of the range for “finalized estimates,” which reflects the very high level of detail in the Sargent and Lundy decommissioning studies. In light of the contingency costs in excess of the appropriate contingency cost percentage, I propose calculating the contingency costs by applying the 10% contingency percentage directly to the total project cost less contingency, as summarized in Attachment PMG-1, Table 5-2.

### **VIII. ESCALATION FACTORS**

**Q. WHAT IS MR. SPANOS PROPOSING REGARDING USING ESCALATION FACTORS?**

1 A. Mr. Spanos incorporated a 2.5% annual escalation factor for each project for the years  
2 between the test period and the final retirement date of each project.<sup>19</sup>

3 **Q. PLEASE EXPLAIN THE PURPOSE OF USING AN ANNUAL ESCALATION**  
4 **FACTOR OVER THE REMAINING LIFE OF PLANT TO INCREASE**  
5 **TERMINAL RETIREMENT COSTS?**

6 A. The purpose of applying an escalation factor to the decommissioning cost estimate is quite  
7 simply to adjust the cost estimate from an estimate of what the project will cost today, to  
8 what the project will cost at the anticipated time that the project will take place.

9 **Q. ARE ESCALATION COSTS APPROPRIATE FOR THE PURPOSE OF**  
10 **ESTIMATING COSTS?**

11 A. Yes. If your goal is to simply and accurately estimate the cost of a project to be performed  
12 in the future, using an escalation factor is appropriate.

13 **Q. IS IT APPROPRIATE TO USE AN ESCALATION FACTOR TO ESTIMATE THE**  
14 **COST OF A PROJECT TO BE RECOVERED FROM CURRENT RATEPAYERS?**

15 A. No. Charging current ratepayers for inflation that has not occurred is not appropriate  
16 because it does not accurately reflect the value of money over time. This is because the  
17 value of a dollar today is not equivalent to the value of a dollar in a future period. This is  
18 the nature of inflation. Thus, the dollar value of the estimated cost of a project today and  
19 the estimated future cost of that project escalated using an inflation factor *are equivalent*  
20 *in value* in real dollars, even though the nominal values are different. This is a fundamental  
21 principle of economics.

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<sup>19</sup> Spanos Direct, pages 12-13, Q&A #33.

1           Charging ratepayers today for the future nominal value of the project cost  
2           inherently double-charges ratepayers for inflation. It escalates the cost from today into  
3           future nominal value and then fails to account for the difference in the value of dollars in  
4           that future period and the value of dollars today. If you are going to represent the  
5           “accurate” cost of a future project, escalated to its nominal dollar value, you must then  
6           discount that project to the period in which the costs are being recovered. This would be  
7           the most accurate way to reflect the appropriate charge to ratepayers for these future project  
8           costs. However, as should be obvious, the appropriate escalation factor and discount factor  
9           cancel each other out and are therefore unnecessary.

10   **Q.   WHAT ARE YOU RECOMMENDING REGARDING USING AN ESCALATION**  
11   **FACTOR?**

12   A.   I recommend the elimination   of the escalation factor from the terminal net salvage  
13   estimates.

14   **Q.   DOES THIS CONCLUDE YOUR TESTIMONY?**

15   A.   Yes.

## EDUCATION •

Marlboro College, Marlboro, Vermont, Bachelor of Arts Degree, Literature and Philosophy

## PROFESSIONAL CERTIFICATIONS & MEMBERSHIP •

Depreciation Professional, by the Society of Depreciation Professionals

## EXPERIENCE •

Mr. Garren provides expert witness testimony to clients, specializing in the area of depreciation. Mr. Garren also provides analytical support to GDS clients and principals including quantitative and qualitative analysis, preparation of client presentations, and case management. Mr. Garren works primarily in the areas of depreciation but has also prepared exhibits for use in the revenue requirement, cost-allocation, rate design, and rate of return aspects of regulatory proceedings. Mr. Garren has also assisted with the preparation of two valuation studies on municipal water companies.

Mr. Garren is a member of, and has been made a Certified Depreciation Professional, by the Society of Depreciation Professionals. In addition, Mr. Garren has attended the National Association of Regulated Utility Commissioners' Rate School.

### *Specific Prior Experience Includes:*

**Snively, King, Majoros, and Associates, Inc.,** Millersville, MD

**Consultant,** 2010 – 2022

- Project manager in numerous utility rate cases at the Federal Energy Regulatory Commission as well as over a dozen state utility Commissions across the country, assisting in settlement negotiations as well as preparing testimony for hearing and assisting with the preparation for all stages of discovery and brief preparation.
- Participated in two municipal water utility valuation studies.
- Participated in the preparation of analysis, testimony and exhibits in numerous rate case subject areas including revenue requirement, rate of return, cost of service and rate design.

**Binder and Binder, New York, NY**

**Legal writer and Non-Attorney Representative,** 2007 – 2008

- Prepared client and ALJ correspondence, case memoranda, expert witness interrogatories, and arguments in favor of appeal.
- Represented clients at hearing, including preparation and presentation of arguments, cross-examination of expert medical witnesses, and preparation of clients for direct examination from ALJs.
- From July 2007, acted as legal writer on behalf of the company's President.

## REGULATORY EXPERIENCE •

- Federal Energy Regulatory Commission
- Arizona Corporation Commission
- Barbados Fair Trade Commission
- Colorado Public Service
- Delaware Public Service Commission
- Georgia Public Service Commission
- Hawai'i Public Utilities Commission
- Kansas Corporation Commission
- Maryland Public Service Commission
- New Jersey Board of Public Utilities
- North Dakota Public Service Commission

- Pennsylvania Public Utilities Commission
- South Dakota Public Utilities Commission
- Utah Public Service Commission
- West Virginia Public Service Commission

## EXPERT TESTIMONY AND CONSULTING IN RATE PROCEEDINGS ●

### ***Recent FERC Transmission Cases in Which Mr. Garren has Participated on Behalf of Transmission Customer Clients***

- Atlantic City Electric Company – Docket No. ER22-2200 (Depreciation)
- Delmarva Power Company - Docket No. ER22-2201 (Depreciation)
- System Energy Resources - Docket No. ER22-736-000 (Depreciation)
- Potomac Electric Power Company – Docket No. ER21-83 (Depreciation)
- Baltimore Gas and Electric Company – Docket No. ER20-1929 (Depreciation)
- Jersey Central Power & Light Company – Docket No. ER20-227-000 (Depreciation)
- Pacific Gas and Electric Company – Docket No. ER17-2154-000 (Depreciation)

### ***Recent State Commission Utility Case in Which Mr. Garren has Participated***

#### ***Arizona Corporation Commission***

- Tucson Electric Power Company - AZ KCC Docket No, E-01933A-19-0028

#### ***Barbados Fair Trade Commission***

- Barbados Light and Power Company –Docket No. FTC-01/2021 BL&P-RRA-20211004

### ***Colorado Public Utilities Commission – On Behalf of Wholesale Customer Clients***

- Public Service Company of Colorado – Proceeding No. 16A-0231E

### ***Delaware Public Service Commission - On Behalf of Wholesale Customer Clients***

- Suez Water Delaware Inc. – DE Docket No. 19-0615

### ***Hawai'i Public Utilities Commission***

- Hawai'i Electric, Hawai'i Electric Light, and Maui Electric - Docket No. 2016-0431

### ***Kansas Corporation Commission***

- Kansas Gas Service - KS KCC Docket No. 18-KGSG-560-RTS
- Empire District Electric Co. - KS KCC Docket No. 19-EPDE-223-RTS

### ***Maryland Public Service Commission***

- Delmarva Power and Light Company - MD Case Nos. 9670, 9424
- Columbia Gas Company - MD Case Nos. 9664, 9480, 9447
- Potomac Edison Company - Maryland Case No. 9490
- Pepco Electric Company - MD Case No. 9385, 9702
- Baltimore Gas and Electric Company - MD Case No. 9355, 9692

### ***New Jersey Board of Public Utilities***

- Public Service Gas and Electric Company – NJ BPU Docket Nos. ER23120924 and GR23120925
- New Jersey American Water Company – NJ BPU Docket Nos. WR24010057
- New Jersey Natural Gas Company – NJ BPU Docket No. GR24010071
- Aqua New Jersey – NJ BPU Docket No. WR24010057
- Elizabethtown Gas Company – NJ BPU Docket No. GR24020158
- Rockland Electric Company - NJ BPU Docket Nos. ER21050823, ER19050552, ER13111135
- New Jersey Natural Gas - NJ BPU Docket No. GR21030679

- Suez Water New Jersey - NJ BPU Docket Nos. WR20110729, WR18050593
- South Jersey Gas Company - NJ BPU Docket No. GR20030243
- Jersey Central Power & Light Company - NJ BPU Docket No. ER 20020146
- Elizabethtown Gas Company - NJ BPU Docket Nos GR19040486, GR16090826
- Public Service Electric and Gas Company - NJ BPU Docket No. ER18010029 & GR18010030
- New Jersey American Water - NJ BPU Docket No WR17090985

#### **North Dakota Public Service Commission**

- Northern States Power – ND OSC Case No. PU-20-441

#### **Pennsylvania Public Utilities Commission**

- UGI Utilities Inc, Electric and Gas Divisions - PA PUC Docket Nos. R-2017-2640058, R-2016-2580030, 2015-2518439
- First Energy Companies PA PUC Docket Nos. R-2016-2537349, 2537352, 2537355, 2537459

#### **South Dakota Public Utilities Commission**

- Montana Dakota Utilities, SD PUC Docket Nos. EL23-020 and NG23-025
- Northwestern Energy, SD PUC Docket No. EL23-016

#### **Utah Public Service Commission**

- Rocky Mountain Power - UT PSC Docket No. 18-035-036

#### **West Virginia Public Service Commission**

- Mountaineer Gas - Case No. 15-0048-G-D

## **SOFTWARE EXPERIENCE ●**

Microsoft Suite: Excel, Word.

Adobe: Acrobat.

Snively King: SCIAS Depreciation Analysis Software



INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO ELECTRIC PLANT AS OF DECEMBER 31, 2026

ACCOUNT (1)		PROBABLE	SURVIVOR	NET	ORIGINAL	BOOK	FUTURE	CALCULATED		COMPOSITE
		RETIREMENT		SALVAGE	COST AS OF	DEPRECIATION		ANNUAL ACCRUAL	REMAINING	
		DATE	CURVE	PERCENT	DECEMBER 31, 2026	RESERVE	ACCRUALS	AMOUNT	RATE	LIFE
		(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)=(8)/(5)	(10)=(7)/(8)
ELECTRIC PLANT										
MISCELLANEOUS INTANGIBLE PLANT										
303.00	MISCELLANEOUS INTANGIBLE PLANT - SOFTWARE		7-SQ	0	250,116,576 ^	167,847,139	82,269,437	20,065,716	8.02%	4.1
303.10	MISCELLANEOUS INTANGIBLE PLANT - SAAS SOFTWARE		5-SQ	0	5,193,639 ^	4,244,234	949,405	632,937	12.19%	1.5
303.11	MISCELLANEOUS INTANGIBLE PLANT - SAAS SOFTWARE		3-SQ	0	5,423,293 ^	5,452,754	(29,460)	0	0.00%	-
303.12	MISCELLANEOUS INTANGIBLE PLANT - ACE SOFTWARE		10-SQ	0	78,811,428 ^	25,199,851	53,611,577	8,247,935	10.47%	6.5
303.13	MISCELLANEOUS INTANGIBLE PLANT - ACE SAAS SOFTWARE		10-SQ	0	2,896,491 ^	1,471,614	1,424,877	219,212	7.57%	6.5
303.14	MISCELLANEOUS INTANGIBLE PLANT - LICENSE SOFTWARE		3-SQ	0	547,577 ^	550,551	(2,974)	0	0.00%	-
TOTAL MISCELLANEOUS INTANGIBLE PLANT					342,989,004	204,766,143	138,222,861	29,165,800	8.50	
STEAM PRODUCTION PLANT										
311.00	STRUCTURES AND IMPROVEMENTS									
	HARDING STREET STATION UNIT 5	12-2030	80-R2.5	*(31)	3,118,389	3,309,227	775,862	198,939	6.38%	3.9
	HARDING STREET STATION UNIT 6	12-2030	80-R2.5	*(32)	2,390,629	2,614,310	541,320	138,800	5.81%	3.9
	HARDING STREET STATION UNITS 5 AND 6	12-2030	80-R2.5	*(33)	3,950,417	3,626,764	1,627,290	406,823	10.30%	4.0
	HARDING STREET STATION UNIT 7	12-2033	80-R2.5	*(30)	22,553,549	17,985,455	11,334,159	1,642,632	7.28%	6.9
	HARDING STREET STATION COMMON	12-2033	80-R2.5	*(31)	41,198,176	33,014,072	20,955,539	3,037,035	7.37%	6.9
	EAGLE VALLEY CCGT	12-2055	80-R2.5	*(6)	22,881,459	3,804,518	20,449,828	722,609	3.16%	28.3
	PETERSBURG UNIT 2	12-2042	80-R2.5	*(30)	1,670,155	1,100,358	1,070,844	68,644	4.11%	15.6
	PETERSBURG UNITS 1 AND 2	12-2042	80-R2.5	*(30)	3,224,232	2,510,571	1,680,930	108,447	3.36%	15.5
	PETERSBURG UNIT 3	12-2042	80-R2.5	*(28)	38,583,754	23,007,697	26,379,508	1,712,955	4.44%	15.4
	PETERSBURG UNIT 4	12-2042	80-R2.5	*(29)	50,963,291	32,361,293	33,381,352	2,153,636	4.23%	15.5
	PETERSBURG UNITS 3 AND 4	12-2042	80-R2.5	*(30)	543,073	382,925	323,069	20,843	3.84%	15.5
	PETERSBURG COMMON	12-2042	80-R2.5	*(29)	116,844,058	68,589,576	82,139,258	5,265,337	4.51%	15.6
TOTAL STRUCTURES AND IMPROVEMENTS					307,921,181	192,306,767	200,658,960	15,476,699	5.03	13.0
311.01	STRUCTURES AND IMPROVEMENTS - MPP									
	HARDING STREET STATION UNIT 5		18-SQ	(31)	1,022	868	471	63	6.14%	7.5
	HARDING STREET STATION UNIT 7		18-SQ	(30)	968,864	1,298,278	(38,755)	0	0.00%	-
	HARDING STREET STATION COMMON		18-SQ	(31)	2,283,189	2,838,926	152,051	10,486	0.46%	14.5
	EAGLE VALLEY CCGT		18-SQ	(6)	37,286	12,148	27,375	2,122	5.69%	12.9
	PETERSBURG UNIT 3		18-SQ	(28)	328,807	453,754	(32,881)	0	0.00%	-
	PETERSBURG COMMON		18-SQ	(29)	419,400	595,548	(54,522)	0	0.00%	-
TOTAL STRUCTURES AND IMPROVEMENTS - MPP					4,038,568	5,199,522	53,739	12,671	0.31	4.2
311.02	STRUCTURES AND IMPROVEMENTS - MATS									
	EAGLE VALLEY CCGT	12-2055	80-R2.5	*(6)	4,507	735	4,042	142	3.16%	28.4
	PETERSBURG UNIT 2	12-2042	80-R2.5	*(30)	202,050	142,852	119,813	7,583	3.75%	15.8
	PETERSBURG UNIT 4	12-2042	80-R2.5	*(29)	73,833	41,841	53,404	3,380	4.58%	15.8
	PETERSBURG COMMON	12-2042	80-R2.5	*(29)	206,395	135,871	130,378	8,252	4.00%	15.8
TOTAL STRUCTURES AND IMPROVEMENTS - MATS					486,785	321,299	307,637	19,357	3.98	15.9
312.00	BOILER PLANT EQUIPMENT									
	HARDING STREET STATION UNIT 5	12-2030	60-R1.5	*(31)	12,639,773	9,890,468	6,667,635	1,709,650	13.53%	3.9
	HARDING STREET STATION UNIT 6	12-2030	60-R1.5	*(32)	11,275,355	9,329,620	5,553,848	1,424,064	12.63%	3.9
	HARDING STREET STATION UNITS 5 AND 6	12-2030	60-R1.5	*(33)	29,168,319	25,010,789	13,783,076	3,445,769	11.81%	4.0
	HARDING STREET STATION UNIT 7	12-2033	60-R1.5	*(30)	107,245,672	81,993,745	57,425,628	8,444,945	7.87%	6.8
	HARDING STREET STATION COMMON	12-2033	60-R1.5	*(31)	113,459,165	60,672,120	87,959,386	12,747,737	11.24%	6.9
	EAGLE VALLEY CCGT	12-2055	60-R1.5	*(6)	180,579,107	34,745,526	156,668,327	5,845,833	3.24%	26.8
	PETERSBURG UNIT 2	12-2042	60-R1.5	*(30)	7,470,957	3,820,700	5,891,544	387,602	5.19%	15.2
	PETERSBURG UNITS 1 AND 2	12-2042	60-R1.5	*(30)	2,569,352	1,515,926	1,824,232	121,615	4.73%	15.0
	PETERSBURG UNIT 3	12-2042	60-R1.5	*(28)	246,315,184	58,820,721	256,462,714	16,762,269	6.81%	15.3
	PETERSBURG UNIT 4	12-2042	60-R1.5	*(29)	286,865,484	93,821,347	276,235,128	18,173,364	6.34%	15.2
	PETERSBURG UNITS 3 AND 4	12-2042	60-R1.5	*(30)	707,460	333,068	586,630	38,342	5.42%	15.3
	PETERSBURG COMMON	12-2042	60-R1.5	*(29)	444,269,430	225,494,892	347,612,673	23,174,178	5.22%	15.0
TOTAL BOILER PLANT EQUIPMENT					1,442,565,258	605,448,922	1,216,670,821	92,275,368	6.40	13.2
312.01	BOILER PLANT EQUIPMENT - MPP									
	HARDING STREET STATION UNIT 5		18-SQ	(31)	2,087,851	2,795,214	(60,129)	(60,129)	-2.88%	1.0
	HARDING STREET STATION UNIT 6		18-SQ	(32)	2,107,770	2,887,645	(105,388)	0	0.00%	-
	HARDING STREET STATION UNITS 5 AND 6		18-SQ	(33)	17,298	15,734	7,272	1,322	7.64%	5.5
	HARDING STREET STATION UNIT 7		18-SQ	(30)	67,894,222	90,978,258	(2,715,769)	0	0.00%	-

INDIANAPOLIS POWER & LIGHT COMPANY  
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TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO ELECTRIC PLANT AS OF DECEMBER 31, 2026

ACCOUNT (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2026 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL		COMPOSITE REMAINING LIFE (10)=(7)/(8)
							AMOUNT (8)	RATE (9)=(8)/(5)	
HARDING STREET STATION COMMON		18-SQ	(31)	12,044,829	16,380,967	(602,241)	0	0.00%	-
PETERSBURG UNIT 3		18-SQ	(28)	66,127,476	91,255,917	(6,612,747)	0	0.00%	-
PETERSBURG UNIT 4		18-SQ	(29)	12,828,423	16,316,161	232,505	89,425	0.70%	2.6
PETERSBURG COMMON		18-SQ	(29)	28,288,704	38,309,734	(1,817,306)	0	0.00%	2.2
<b>TOTAL BOILER PLANT EQUIPMENT - MPP</b>				<b>191,396,574</b>	<b>258,939,630</b>	<b>(11,673,804)</b>	<b>30,618</b>	<b>0.02</b>	<b>(381.3)</b>
312.02 BOILER PLANT EQUIPMENT - MATS									
HARDING STREET STATION COMMON	12-2033	60-R1.5	*(31)	10	9	3	1	9.07%	4.0
PETERSBURG UNIT 3	12-2042	60-R1.5	*(28)	16,647,986	11,515,294	9,794,129	635,982	3.82%	15.4
PETERSBURG UNIT 4	12-2042	60-R1.5	*(29)	237,564	334,965	(28,507)	0	0.00%	-
PETERSBURG COMMON	12-2042	60-R1.5	*(29)	11,055	5,836	8,425	547	4.95%	15.4
<b>TOTAL BOILER PLANT EQUIPMENT - MATS</b>				<b>16,896,614</b>	<b>11,856,104</b>	<b>9,774,049</b>	<b>636,530</b>	<b>3.77</b>	<b>15.4</b>
312.30 ASH AND COAL HANDLING EQUIPMENT									
HARDING STREET STATION UNIT 5	12-2030	50-R1.5	*(31)	39,326	53,483	(1,966)	0	-	-
HARDING STREET STATION UNIT 6	12-2030	50-R1.5	*(32)	59,223	79,443	(1,268)	(325)	-0.55%	3.9
HARDING STREET STATION UNITS 5 AND 6	12-2030	50-R1.5	*(33)	24,773	28,552	4,396	1,127	4.55%	3.9
HARDING STREET STATION UNIT 7	12-2033	50-R1.5	*(30)	567,973	703,358	35,007	5,304	0.93%	6.6
HARDING STREET STATION COMMON	12-2033	50-R1.5	*(31)	4,173,479	4,659,614	807,644	118,771	2.85%	6.8
PETERSBURG UNIT 3	12-2042	50-R1.5	*(28)	108,644	149,828	(10,864)	0	0.00%	-
PETERSBURG UNIT 4	12-2042	50-R1.5	*(29)	22,000	31,020	(2,640)	0	0.00%	-
PETERSBURG UNITS 3 AND 4	12-2042	50-R1.5	*(30)	26,400	26,063	8,257	550	2.09%	15.0
PETERSBURG COMMON	12-2042	50-R1.5	*(29)	1,660,298	2,357,623	(215,839)	0	0.00%	-
<b>TOTAL ASH AND COAL HANDLING EQUIPMENT</b>				<b>6,682,116</b>	<b>8,089,084</b>	<b>622,727</b>	<b>125,428</b>	<b>1.88</b>	<b>5.0</b>
312.31 ASH AND COAL HANDLING EQUIPMENT - MPP									
HARDING STREET STATION UNIT 7		18-SQ	(30)	96,529	129,349	(3,861)	0	-	-
HARDING STREET STATION COMMON		18-SQ	(31)	133,130	181,057	(6,656)	0	-	-
<b>TOTAL ASH AND COAL HANDLING EQUIPMENT - MPP</b>				<b>229,659</b>	<b>310,406</b>	<b>(10,517)</b>	<b>0</b>	<b>-</b>	<b>-</b>
312.40 RAILROAD TRACK SYSTEM/CARS									
PETERSBURG COMMON	12-2042	25-S1	*(29)	272,620	132,056	219,624	16,390	6.01%	13.4
<b>TOTAL RAILROAD TRACK SYSTEM/CARS</b>				<b>272,620</b>	<b>132,056</b>	<b>219,624</b>	<b>16,390</b>	<b>6.01</b>	<b>13.4</b>
314.00 TURBOGENERATOR UNITS									
HARDING STREET STATION UNIT 5	12-2030	60-R1.5	*(31)	10,957,398	10,283,956	4,070,236	1,043,650	9.52%	3.9
HARDING STREET STATION UNIT 6	12-2030	60-R1.5	*(32)	9,907,801	8,371,853	3,396,445	868,319	9.75%	3.9
HARDING STREET STATION UNITS 5 AND 6	12-2030	60-R1.5	*(33)	743,622	673,496	315,521	78,880	10.61%	4.0
HARDING STREET STATION UNIT 7	12-2033	60-R1.5	*(30)	44,111,197	37,601,306	19,743,250	2,903,419	6.58%	6.8
HARDING STREET STATION COMMON	12-2033	60-R1.5	*(31)	17,613,976	7,405,456	15,668,852	2,304,243	13.08%	6.8
EAGLE VALLEY CCGT	12-2055	60-R1.5	*(6)	112,767,072	23,115,182	96,417,914	3,584,309	3.18%	26.9
PETERSBURG UNIT 2	12-2042	60-R1.5	*(30)	585,614	403,254	358,044	24,030	4.10%	14.9
PETERSBURG UNIT 3	12-2042	60-R1.5	*(30)	57,826,391	36,323,686	38,850,622	2,607,424	4.51%	14.9
PETERSBURG UNIT 4	12-2042	60-R1.5	*(28)	86,222,920	57,049,931	53,315,407	3,578,215	4.15%	14.9
PETERSBURG UNITS 3 AND 4	12-2042	60-R1.5	*(29)	181,784	164,326	70,175	5,013	2.76%	14.0
PETERSBURG COMMON	12-2042	60-R1.5	*(30)	32,421,595	26,365,549	15,782,525	1,111,445	3.43%	14.2
<b>TOTAL TURBOGENERATOR UNITS</b>				<b>372,339,370</b>	<b>207,757,995</b>	<b>247,978,992</b>	<b>18,108,948</b>	<b>4.86</b>	<b>13.7</b>
314.01 TURBOGENERATOR UNITS - MPP									
HARDING STREET STATION COMMON		18-SQ	(31)	57,280	77,901	0	0	-	-
<b>TOTAL TURBOGENERATOR UNITS - MPP</b>				<b>57,280</b>	<b>77,901</b>	<b>0</b>	<b>0</b>	<b>-</b>	<b>-</b>

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TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO ELECTRIC PLANT AS OF DECEMBER 31, 2026

	ACCOUNT (1)	PROBABLE	SURVIVOR CURVE (3)	NET		ORIGINAL	BOOK	FUTURE	CALCULATED		COMPOSITE
		RETIREMENT DATE (2)		SALVAGE PERCENT (4)		COST AS OF DECEMBER 31, 2026 (5)	DEPRECIATION RESERVE (6)		ACCRUALS (7)	ANNUAL ACCRUAL AMOUNT (8)	
315.00	ACCESSORY ELECTRIC EQUIPMENT										
	HARDING STREET STATION UNIT 5	12-2030	70-R2.5	*	(31)	5,304,732	1,681,648	5,267,550	1,316,888	24.82%	4.0
	HARDING STREET STATION UNIT 6	12-2030	70-R2.5	*	(32)	1,992,477	1,332,254	1,297,815	332,773	16.70%	3.9
	HARDING STREET STATION UNITS 5 AND 6	12-2030	70-R2.5	*	(33)	9,132,827	7,755,827	4,390,832	1,097,708	12.02%	4.0
	HARDING STREET STATION UNIT 7	12-2033	70-R2.5	*	(30)	14,959,058	10,790,730	8,656,045	1,254,499	8.39%	6.9
	HARDING STREET STATION COMMON	12-2033	70-R2.5	*	(31)	26,360,308	18,990,302	15,541,702	2,252,421	8.54%	6.9
	EAGLE VALLEY CCGT	12-2055	70-R2.5	*	(6)	85,238,428	15,942,054	74,410,679	2,657,524	3.12%	28.0
	PETERSBURG UNIT 2	12-2042	70-R2.5	*	(30)	5,950,254	3,133,025	4,602,306	296,923	4.99%	15.5
	PETERSBURG UNIT 3	12-2042	70-R2.5	*	(30)	37,813,365	10,687,505	38,469,869	2,450,310	6.48%	15.7
	PETERSBURG UNIT 4	12-2042	70-R2.5	*	(28)	42,166,188	10,898,404	43,074,316	2,743,587	6.51%	15.7
	PETERSBURG UNITS 3 AND 4	12-2042	70-R2.5	*	(29)	963	1,387	(144)	0	0.00%	-
	PETERSBURG COMMON	12-2042	70-R2.5	*	(30)	125,751,248	73,290,304	90,186,318	5,933,310	4.72%	15.2
	TOTAL ACCESSORY ELECTRIC EQUIPMENT					354,669,847	154,503,441	285,897,289	20,335,943	5.73	14.1
315.01	ACCESSORY ELECTRIC EQUIPMENT - MPP										
	HARDING STREET STATION UNIT 5		18-SQ		(31)	37,886	51,525	(1,894)	0	-	-
	HARDING STREET STATION UNIT 6		18-SQ		(32)	33,660	46,114	(1,683)	0	-	-
	HARDING STREET STATION UNIT 7		18-SQ		(30)	11,667,269	15,634,140	(466,691)	0	-	-
	HARDING STREET STATION COMMON		18-SQ		(31)	13,474,582	18,325,432	(673,729)	0	-	-
	PETERSBURG UNIT 3		18-SQ		(30)	2,713,199	3,744,214	(217,056)	0	-	-
	PETERSBURG UNIT 4		18-SQ		(28)	9,729,349	13,718,382	(1,264,815)	0	-	-
	PETERSBURG COMMON		18-SQ		(30)	7,945,746	10,893,869	(564,400)	(434,154)	-5.46%	1.3
	TOTAL ACCESSORY ELECTRIC EQUIPMENT - MPP					45,601,690	62,413,676	(3,190,268)	(434,154)	(0.95)	7.4
315.02	ACCESSORY ELECTRIC EQUIPMENT - MATS										
	PETERSBURG UNIT 3	12-2042	70-R2.5	*	(30)	11,041,203	6,371,758	7,981,806	508,395	4.60%	15.7
	PETERSBURG COMMON	12-2042	70-R2.5	*	(30)	24,355	12,017	19,644	1,243	5.10%	15.8
	TOTAL ACCESSORY ELECTRIC EQUIPMENT - MATS					11,065,558	6,383,775	8,001,450	509,639	4.61	15.7
316.00	MISCELLANEOUS POWER PLANT EQUIPMENT										
	HARDING STREET STATION UNIT 5	12-2030	60-S0.5	*	(31)	135,254	137,172	40,011	10,259	7.59%	3.9
	HARDING STREET STATION UNIT 6	12-2030	60-S0.5	*	(32)	804,056	501,589	559,765	139,941	17.40%	4.0
	HARDING STREET STATION UNITS 5 AND 6	12-2030	60-S0.5	*	(33)	306,931	278,597	129,621	32,405	10.56%	4.0
	HARDING STREET STATION UNIT 7	12-2033	60-S0.5	*	(30)	2,549,338	2,322,868	991,271	145,775	5.72%	6.8
	HARDING STREET STATION COMMON	12-2033	60-S0.5	*	(31)	8,122,349	4,919,057	5,721,220	829,162	10.21%	6.9
	EAGLE VALLEY CCGT	12-2055	60-S0.5	*	(6)	206,153,249	46,476,399	172,046,045	6,467,896	3.14%	26.6
	PETERSBURG UNIT 2	12-2042	60-S0.5	*	(30)	434,312	298,130	266,475	18,128	4.17%	14.7
	PETERSBURG UNIT 3	12-2042	60-S0.5	*	(30)	4,575,449	2,727,335	3,220,749	214,717	4.69%	15.0
	PETERSBURG UNIT 4	12-2042	60-S0.5	*	(28)	6,054,075	1,202,817	6,546,399	422,348	6.98%	15.5
	PETERSBURG UNITS 3 AND 4	12-2042	60-S0.5	*	(29)	432,569	230,480	327,534	21,407	4.95%	15.3
	PETERSBURG COMMON	12-2042	60-S0.5	*	(30)	15,334,500	11,689,067	8,245,782	557,147	3.63%	14.8
	TOTAL MISCELLANEOUS POWER PLANT EQUIPMENT					244,902,081	70,783,511	198,094,872	8,859,187	3.62	22.4
316.01	MISCELLANEOUS POWER PLANT EQUIPMENT - MPP										
	HARDING STREET STATION UNIT 6		18-SQ		(32)	38,501	52,747	(1,925)	0	0.00%	-
	HARDING STREET STATION UNIT 7		18-SQ		(30)	1,200,322	1,569,520	(9,101)	(2,117)	-0.18%	4.3
	HARDING STREET STATION COMMON		18-SQ		(31)	747,040	994,197	(15,574)	(1,354)	-0.18%	11.5
	EAGLE VALLEY CCGT		18-SQ		(6)	11,892	2,515	10,091	696	5.85%	14.5
	PETERSBURG UNIT 3		18-SQ		(30)	17,837	24,305	(1,117)	(1,117)	-6.26%	1.0
	PETERSBURG UNIT 4		18-SQ		(28)	19,625	27,671	(2,551)	0	0.00%	-
	PETERSBURG COMMON		18-SQ		(30)	859,926	1,130,378	(12,475)	(5,940)	-0.69%	2.1
	TOTAL MISCELLANEOUS POWER PLANT EQUIPMENT - MPP					2,895,144	3,801,333	(32,652)	(9,832)	(0.34)	3.3
316.02	MISCELLANEOUS POWER PLANT EQUIPMENT - MATS										
	PETERSBURG UNIT 3	12-2042	60-S0.5	*	(30)	131,335	68,698	102,037	6,669	5.08%	15.3
	PETERSBURG COMMON	12-2042	60-S0.5	*	(30)	57,092	30,726	43,493	2,843	4.98%	15.3
	TOTAL MISCELLANEOUS POWER PLANT EQUIPMENT - MATS					188,427	99,424	145,531	9,512	5.05	15.3
	TOTAL STEAM PRODUCTION PLANT					3,002,208,773	1,588,424,844	2,153,518,451	155,972,304	5.20	

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TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO ELECTRIC PLANT AS OF DECEMBER 31, 2026

	ACCOUNT (1)	PROBABLE	SURVIVOR CURVE (3)	NET	ORIGINAL COST AS OF DECEMBER 31, 2026 (5)	BOOK	FUTURE ACCRUALS (7)	CALCULATED		COMPOSITE	
		RETIREMENT DATE (2)		SALVAGE PERCENT (4)		DEPRECIATION RESERVE (6)		ANNUAL ACCRUAL AMOUNT (8)	RATE (9)=(8)/(5)		REMAINING LIFE (10)=(7)/(8)
	OTHER PRODUCTION PLANT										
341.00	STRUCTURES AND IMPROVEMENTS										
	GEORGETOWN GTs COMMON	12-2052	50-R3	*	(11)	803,370	484,547	407,193	18,017	2.24%	22.6
	HARDING STREET STATION GTs 1 AND 2	05-2023	50-R3	*	(32)	227,129	370,220	(70,410)	0	-	-
	HARDING STREET STATION GT 4	12-2044	50-R3	*	(22)	2,306,838	2,389,013	425,330	28,168	1.22%	15.1
	HARDING STREET STATION GT 5	12-2045	50-R3	*	(22)	1,985,804	2,011,485	411,196	25,861	1.30%	15.9
	HARDING STREET STATION GT 6	12-2052	50-R3	*	(21)	833,628	647,215	361,475	16,431	1.97%	22.0
	HARDING STREET STATION GTs COMMON	12-2052	50-R3	*	(22)	2,801,161	2,457,389	960,027	48,243	1.72%	19.9
	EAGLE VALLEY CCGT	12-2055	50-R3	*	(3)	657,614	105,536	571,500	20,558	3.13%	27.8
	TOTAL STRUCTURES AND IMPROVEMENTS					9,615,545	8,465,405	3,066,312	157,277	1.64	19.5
342.00	FUEL HOLDERS, PRODUCERS AND ACCESSORIES - HANDLING AND STORAGE										
	GEORGETOWN GTs COMMON	12-2052	55-R4	*	(11)	1,328,316	1,012,024	462,406	20,018	1.51%	23.1
	HARDING STREET STATION GT 4	12-2044	55-R4	*	(22)	196,495	219,793	19,930	1,238	0.63%	16.1
	HARDING STREET STATION GT 5	12-2045	55-R4	*	(22)	231,985	228,687	54,335	3,070	1.32%	17.7
	HARDING STREET STATION GT 6	12-2052	55-R4	*	(21)	1,642,050	1,374,723	612,158	25,939	1.58%	23.6
	HARDING STREET STATION GTs COMMON	12-2052	55-R4	*	(22)	2,162,058	2,024,751	612,959	27,989	1.29%	21.9
	TOTAL FUEL HOLDERS, PRODUCERS AND ACCESSORIES - HANDLING AND STORAGE					5,560,904	4,859,978	1,761,789	78,253	1.41	22.5
343.00	PRIME MOVERS										
	GEORGETOWN GTs COMMON	12-2052	50-R3	*	(11)	40,841,466	30,150,871	15,183,156	712,824	1.75%	21.3
	HARDING STREET STATION GTs 1 AND 2	05-2023	50-R3	*	(32)	712,603	1,161,543	(220,907)	0	0.00%	-
	HARDING STREET STATION GT 4	12-2044	50-R3	*	(22)	17,260,984	18,323,922	2,734,478	178,724	1.04%	15.3
	HARDING STREET STATION GT 5	12-2045	50-R3	*	(22)	16,543,901	17,319,134	2,864,426	179,027	1.08%	16.0
	HARDING STREET STATION GT 6	12-2052	50-R3	*	(21)	37,336,890	30,896,224	14,281,413	655,111	1.75%	21.8
	HARDING STREET STATION GTs COMMON	12-2052	50-R3	*	(22)	5,151,727	4,906,076	1,379,031	70,359	1.37%	19.6
	EAGLE VALLEY CCGT	12-2055	50-R3	*	(3)	2,930,212	821,477	2,195,276	80,120	2.73%	27.4
	TOTAL PRIME MOVERS					120,777,784	103,579,247	38,416,873	1,876,164	1.55	20.5
344.00	GENERATORS										
	GEORGETOWN GTs COMMON	12-2052	50-S1	*	(11)	12,856,393	6,650,223	7,620,374	346,381	2.69%	22.0
	HARDING STREET STATION GTs 1 AND 2	05-2023	50-S1	*	(32)	1,637,539	2,669,189	(507,638)	0	-	-
	HARDING STREET STATION GT 4	12-2044	50-S1	*	(22)	6,507,309	3,779,494	4,159,423	250,568	3.85%	16.6
	HARDING STREET STATION GT 5	12-2045	50-S1	*	(22)	4,714,620	3,806,072	1,945,764	117,925	2.50%	16.5
	HARDING STREET STATION GT 6	12-2052	50-S1	*	(21)	11,368,427	8,611,314	5,144,483	248,526	2.19%	20.7
	HARDING STREET STATION GTs COMMON	12-2052	50-S1	*	(22)	29,882,065	10,372,368	26,083,751	1,114,690	3.73%	23.4
	EAGLE VALLEY CCGT	12-2055	50-S1	*	(3)	113,755,103	27,158,701	89,956,033	3,433,436	3.02%	26.2
	TOTAL GENERATORS					180,721,456	63,047,361	134,402,190	5,511,526	3.05	24.4
345.00	ACCESSORY ELECTRIC EQUIPMENT										
	GEORGETOWN GTs COMMON	12-2052	45-S2.5	*	(11)	7,144,101	3,845,159	4,084,793	208,408	2.92%	19.6
	HARDING STREET STATION GTs 1 AND 2	05-2023	45-S2.5	*	(32)	2,588,005	4,218,448	(802,282)	0	-	-
	HARDING STREET STATION GT 4	12-2044	45-S2.5	*	(22)	3,115,767	2,521,758	1,279,478	93,393	3.00%	13.7
	HARDING STREET STATION GT 5	12-2045	45-S2.5	*	(22)	2,417,997	1,961,508	988,448	69,609	2.88%	14.2
	HARDING STREET STATION GT 6	12-2052	45-S2.5	*	(21)	2,002,747	1,357,799	1,065,525	55,496	2.77%	19.2
	HARDING STREET STATION GTs COMMON	12-2052	45-S2.5	*	(22)	6,035,175	4,284,852	3,078,062	172,925	2.87%	17.8
	EAGLE VALLEY CCGT	12-2055	45-S2.5	*	(3)	9,974,060	2,215,614	8,053,019	299,369	3.00%	26.9
	TOTAL ACCESSORY ELECTRIC EQUIPMENT					33,277,852	20,405,138	17,747,043	899,199	2.70	19.7
346.00	MISCELLANEOUS POWER PLANT EQUIPMENT										
	GEORGETOWN GTs COMMON	12-2052	45-S2.5	*	(11)	242,043	164,206	104,462	5,249	2.17%	19.9
	HARDING STREET STATION GTs 1 AND 2	05-2023	45-S2.5	*	(32)	40,040	65,265	(12,412)	0	-	-
	HARDING STREET STATION GT 4	12-2044	45-S2.5	*	(22)	110,634	84,264	50,710	3,092	2.79%	16.4
	HARDING STREET STATION GT 5	12-2045	45-S2.5	*	(22)	266,365	251,750	73,215	4,817	1.81%	15.2
	HARDING STREET STATION GT 6	12-2052	45-S2.5	*	(21)	131,437	111,459	47,580	2,517	1.92%	18.9
	HARDING STREET STATION GTs COMMON	12-2052	45-S2.5	*	(22)	2,337,388	1,303,624	1,547,989	70,363	3.01%	22.0
	EAGLE VALLEY CCGT	12-2055	45-S2.5	*	(3)	249,974	43,348	214,009	7,754	3.10%	27.6
	TOTAL MISCELLANEOUS POWER PLANT EQUIPMENT					3,377,882	2,023,916	2,025,553	93,793	2.78	21.6
	TOTAL OTHER PRODUCTION PLANT					353,331,422	202,381,046	197,419,760	8,616,212	2.44	

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	ACCOUNT (1)	PROBABLE	SURVIVOR CURVE (3)	NET	ORIGINAL	BOOK	FUTURE ACCRUALS (7)	CALCULATED		COMPOSITE	
		RETIREMENT DATE (2)		SALVAGE PERCENT (4)	COST AS OF DECEMBER 31, 2026 (5)	DEPRECIATION RESERVE (6)		ANNUAL ACCRUAL AMOUNT (8)	RATE (9)=(8)/(5)		REMAINING LIFE (10)=(7)/(8)
	OTHER PRODUCTION - WIND										
344.10	GENERATORS - WIND HOOSIER WIND	12-2039	45-R2.5	*	(4)	148,757,424	110,355,909	45,042,247	3,661,971	2.46%	12.3
	TOTAL GENERATORS - WIND					148,757,424	110,355,909	45,042,247	3,661,971	2.46	12.3
	TOTAL OTHER PRODUCTION - WIND					148,757,424	110,355,909	45,042,247	3,661,971	2.46	
	OTHER PRODUCTION - SOLAR										
344.20	GENERATORS - SOLAR HARDING STREET SOLAR	12-2050	25-S2.5	*	(20)	1,125,000	79,819	1,270,181	60,774	5.40%	20.9
	TOTAL GENERATORS - SOLAR					1,125,000	79,819	1,270,181	60,774	5.40	20.9
	TOTAL OTHER PRODUCTION - SOLAR					1,125,000	79,819	1,270,181	60,774	5.40	
	TRANSMISSION PLANT										
350.50	LAND RIGHTS		80-R4		0	21,432,193	11,016,181	10,416,012	257,185	1.20%	40.5
351.00	ENERGY STORAGE EQUIPMENT		15-L3		0	10,305,630	8,686,407	1,619,223	279,176	2.71%	5.8
352.00	STRUCTURES AND IMPROVEMENTS		75-R3		(10)	32,338,924	6,181,994	29,390,822	449,038	1.39%	65.5
353.00	STATION EQUIPMENT		50-S0		(15)	362,152,897	76,786,957	339,688,874	8,244,876	2.28%	41.2
353.01	STATION EQUIPMENT - MPP		18-SQ		0	2,074,909	1,455,387	619,522	65,213	3.14%	9.5
354.00	TOWERS AND FIXTURES		80-R4		(25)	53,784,747	45,064,036	22,166,898	501,400	0.93%	44.2
355.00	POLES AND FIXTURES		70-R2		(20)	60,126,803	23,093,912	49,058,252	882,373	1.47%	55.6
355.01	POLES AND FIXTURES - MPP		18-SQ		(10)	404,723	385,757	59,438	4,156	1.03%	14.3
356.00	OVERHEAD CONDUCTORS AND DEVICES		70-R2		(70)	91,896,301	53,255,635	102,968,076	2,042,612	2.22%	50.4
357.00	UNDERGROUND CONDUIT		60-R3		0	13,019	753	12,266	223	1.71%	55.0
358.00	UNDERGROUND CONDUCTORS AND DEVICES		30-R0.5		(10)	500,949	63,846	487,198	17,912	3.58%	27.2
	TOTAL TRANSMISSION PLANT					635,031,094	225,990,866	556,486,581	12,744,164	2.01	
	DISTRIBUTION PLANT										
360.50	LAND RIGHTS		75-R4		0	174,444	324,358	(149,915)	(3,956)	-2.27%	37.9
361.00	STRUCTURES AND IMPROVEMENTS		65-R2.5		(10)	16,713,597	5,305,221	13,079,735	261,595	1.57%	50.0
362.00	STATION EQUIPMENT		61-R1		(5)	390,383,191	98,780,138	311,122,213	5,740,262	1.47%	54.2
364.00	POLES, TOWERS AND FIXTURES		60-R2.5		(110)	644,540,089	195,200,883	1,158,333,303	21,530,359	3.34%	53.8
365.00	OVERHEAD CONDUCTORS AND DEVICES		60-R1		(45)	560,172,258	217,278,975	594,970,800	10,876,980	1.94%	54.7
366.00	UNDERGROUND CONDUIT		60-R1.5		(20)	221,375,112	64,232,725	201,417,409	4,036,421	1.82%	49.9
367.00	UNDERGROUND CONDUCTORS AND DEVICES		50-R2		(20)	447,107,713	202,068,384	334,460,872	8,237,953	1.84%	40.6
368.00	LINE TRANSFORMERS		45-R1		(5)	374,130,527	134,527,738	258,309,316	6,539,476	1.75%	39.5
369.00	SERVICES		57-S2.5		(75)	173,206,527	154,012,353	149,099,068	3,584,112	2.07%	41.6
370.00	METERS		23-S0		0	44,355,425	24,838,177	19,517,247	1,049,314	2.37%	18.6
370.01	METERS - SMART METERS		15-S1.5		0	105,133,755	62,350,905	42,782,850	4,321,500	4.11%	9.9
371.00	INSTALLATIONS ON CUSTOMERS' PREMISES		40-S1.5		(30)	47,529,015	53,860,208	7,927,511	241,692	0.51%	32.8
371.01	ELECTRIC VEHICLE EQUIPMENT		10-S3		0	5,690,512	1,155,240	4,535,272	588,996	10.35%	7.7
373.00	STREET LIGHTING AND SIGNAL SYSTEMS		45-S0		(30)	70,327,306	58,514,944	32,910,553	982,405	1.40%	33.5
373.01	STREET LIGHTING AND SIGNAL SYSTEMS - LED		25-R2		(10)	610,084	427,459	243,633	11,602	1.90%	21.0
	TOTAL DISTRIBUTION PLANT					3,101,449,552	1,272,877,710	3,128,559,866	67,998,711	2.19	
	GENERAL PLANT										
390.00	STRUCTURES AND IMPROVEMENTS										
	ELECTRICAL BUILDING	06-2056	75-R1	*	(30)	47,843,905	14,122,459	48,074,618	1,765,028	3.69	27.2
	MORRIS STREET SERVICE CENTER	06-2043	75-R1	*	(30)	43,083,563	27,634,613	28,374,018	1,809,085	4.20	15.7
	ARLINGTON SERVICE CENTER	06-2035	75-R1	*	(30)	11,139,436	9,534,554	4,946,713	596,842	5.36	8.3
	CUSTOMER SERVICE CENTER	06-2042	75-R1	*	(30)	3,235,446	2,391,823	1,814,257	122,765	3.79	14.8
	OTHER STRUCTURES		45-R3		(5)	5,235,174	1,499,000	3,997,932	135,308	2.58	29.5
	TOTAL STRUCTURES AND IMPROVEMENTS					110,537,523	55,182,449	87,207,538	4,429,028	4.01	
391.00	OFFICE FURNITURE AND EQUIPMENT		21-SQ		0	12,059,224	7,057,263	5,529,962	600,867	4.77	9.2
391.60	OFFICE FURNITURE AND EQUIPMENT - COMPUTER EQUIPMENT		5-SQ		0	21,624,177	9,678,664	11,946,264	5,843,746	27.02	2.0
392.00	TRANSPORTATION EQUIPMENT		13-L2		10	56,163,133	39,949,006	10,597,814	1,275,992	2.27	8.3
393.00	STORES EQUIPMENT		27-SQ		0	1,835,117	1,025,859	809,258	70,065	3.82	11.6
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT		25-SQ		0	17,811,640	7,049,528	10,762,111	713,871	4.01	15.1
395.00	LABORATORY EQUIPMENT		23-SQ		0	3,409,421	2,309,864	1,099,557	137,068	4.02	8.0

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TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO ELECTRIC PLANT AS OF DECEMBER 31, 2026

ACCOUNT (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2026 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL		COMPOSITE REMAINING LIFE (10)=(7)/(8)
							AMOUNT (8)	RATE (9)=(8)/(5)	
396.00	POWER OPERATED EQUIPMENT	18-SQ	0	1,826,945	1,056,999	769,947	113,246	6.20	6.8
397.00	COMMUNICATION EQUIPMENT	18-SQ	0	37,295,476 <sup>^</sup>	18,551,546	19,843,930	1,991,729	5.19	10.0
398.00	MISCELLANEOUS EQUIPMENT	27-SQ	0	1,963,090 <sup>^</sup>	1,137,380	1,540,710	100,740	3.76	15.3
	<b>TOTAL GENERAL PLANT</b>			<b>264,525,748</b>	<b>142,998,558</b>	<b>150,107,091</b>	<b>15,276,352</b>	<b>5.77</b>	
	<b>TOTAL DEPRECIABLE PLANT</b>			<b>7,849,418,017</b>	<b>3,747,874,895</b>	<b>6,370,627,038</b>	<b>293,496,288</b>	<b>3.74</b>	
<b>PETERSBURG STEAM PRODUCTION PLANT TO BE REFUELED</b>									
311.00	STRUCTURES AND IMPROVEMENTS								
	PETERSBURG UNIT 3	05-2026	80-R2.5	(26)	1,156,277	1,456,909	0	0	-
	PETERSBURG UNIT 4	11-2026	80-R2.5	(26)	3,550,426	4,473,537	0	0	-
	PETERSBURG UNITS 3 AND 4	11-2026	80-R2.5	(26)	12,811	16,142	0	0	-
	PETERSBURG COMMON	11-2026	80-R2.5	(26)	12,313,550	15,515,074	0	0	-
	<b>TOTAL STRUCTURES AND IMPROVEMENTS</b>				17,033,064	21,461,662	0	0	-
311.01	STRUCTURES AND IMPROVEMENTS - MPP								
	PETERSBURG UNIT 4	11-2026	18-SQ	(26)	13,368,811	16,844,702	0	0	-
	PETERSBURG COMMON	11-2026	18-SQ	(26)	61,040	76,911	0	0	-
	<b>TOTAL STRUCTURES AND IMPROVEMENTS - MPP</b>				13,429,851	16,921,613	0	0	-
312.00	BOILER PLANT EQUIPMENT								
	PETERSBURG UNIT 3	05-2026	60-R1.5	(26)	12,901,609	16,256,027	0	0	-
	PETERSBURG UNIT 4	11-2026	60-R1.5	(26)	25,127,553	31,660,716	0	0	-
	PETERSBURG UNITS 3 AND 4	11-2026	60-R1.5	(26)	472,265	595,053	0	0	-
	PETERSBURG COMMON	11-2026	60-R1.5	(26)	88,108,537	111,016,757	0	0	-
	<b>TOTAL BOILER PLANT EQUIPMENT</b>				126,609,963	159,528,553	0	0	-
312.01	BOILER PLANT EQUIPMENT - MPP								
	PETERSBURG UNIT 3	05-2026	18-SQ	(26)	7,951,871	10,019,357	0	0	-
	PETERSBURG UNIT 4	11-2026	18-SQ	(26)	64,677,094	81,493,138	0	0	-
	PETERSBURG COMMON	11-2026	18-SQ	(26)	42,687	53,789	0	0	-
	<b>TOTAL BOILER PLANT EQUIPMENT - MPP</b>				72,671,651	91,566,280	0	0	-
312.02	BOILER PLANT EQUIPMENT - MATS								
	PETERSBURG UNIT 3	05-2026	60-R1.5	(26)	20,848,263	26,268,811	0	0	-
	PETERSBURG UNIT 4	11-2026	60-R1.5	(26)	23,437,981	29,531,856	0	0	-
	<b>TOTAL BOILER PLANT EQUIPMENT - MATS</b>				44,286,244	55,800,667	0	0	-
312.30	ASH AND COAL HANDLING EQUIPMENT								
	PETERSBURG UNIT 3	05-2026	50-R1.5	(26)	17,699,635	22,301,540	0	0	-
	PETERSBURG UNIT 4	11-2026	50-R1.5	(26)	26,270,244	33,100,508	0	0	-
	PETERSBURG UNITS 3 AND 4	11-2026	50-R1.5	(26)	48,727	61,396	0	0	-
	PETERSBURG COMMON	11-2026	50-R1.5	(26)	76,931,140	96,933,236	0	0	-
	<b>TOTAL ASH AND COAL HANDLING EQUIPMENT</b>				120,949,746	152,396,680	0	0	-
312.32	ASH AND COAL HANDLING EQUIPMENT - MATS								
	PETERSBURG UNIT 3	05-2026	50-R1.5	(26)	412,954	520,322	0	0	-
	<b>TOTAL ASH AND COAL HANDLING EQUIPMENT - MATS</b>				412,954	520,322	0	0	-
312.40	RAILROAD TRACK SYSTEM/CARS								
	PETERSBURG COMMON	11-2026	25-S1	(26)	57,345	72,254	0	0	-
	<b>TOTAL RAILROAD TRACK SYSTEM/CARS</b>				57,345	72,254	0	0	-
315.00	ACCESSORY ELECTRIC EQUIPMENT								
	PETERSBURG UNIT 3	05-2026	70-R2.5	(26)	305,482	384,908	0	0	-
	PETERSBURG UNIT 4	11-2026	70-R2.5	(26)	113,385	142,865	0	0	-
	PETERSBURG UNITS 3 AND 4	11-2026	70-R2.5	(26)	47,834	60,270	0	0	-
	PETERSBURG COMMON	11-2026	70-R2.5	(26)	7,103,335	8,950,202	0	0	-
	<b>TOTAL ACCESSORY ELECTRIC EQUIPMENT</b>				7,570,037	9,538,245	0	0	-

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TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO ELECTRIC PLANT AS OF DECEMBER 31, 2026

	ACCOUNT (1)	PROBABLE	SURVIVOR		NET	ORIGINAL	BOOK	FUTURE	CALCULATED		COMPOSITE
		RETIREMENT DATE (2)				CURVE (3)	SALVAGE PERCENT (4)		COST AS OF DECEMBER 31, 2026 (5)	DEPRECIATION RESERVE (6)	
315.01	ACCESSORY ELECTRIC EQUIPMENT - MPP PETERSBURG UNIT 4	11-2026	18-SQ	*	(26)	2,409,196	3,035,587	0	0	-	-
	TOTAL ACCESSORY ELECTRIC EQUIPMENT - MPP					2,409,196	3,035,587	0	0	-	-
316.00	MISCELLANEOUS POWER PLANT EQUIPMENT PETERSBURG UNIT 3	05-2026	60-S0.5	*	(26)	73,757	92,934	0	0	-	-
	PETERSBURG UNIT 4	11-2026	60-S0.5	*	(26)	496,324	625,368	0	0	-	-
	PETERSBURG COMMON	11-2026	60-S0.5	*	(26)	1,087,457	1,370,196	0	0	-	-
	TOTAL MISCELLANEOUS POWER PLANT EQUIPMENT					1,657,538	2,088,498	0	0	-	-
316.01	MISCELLANEOUS POWER PLANT EQUIPMENT - MPP PETERSBURG UNIT 4	11-2026	18-SQ	*	(26)	353,649	445,598	0	0	-	-
	TOTAL MISCELLANEOUS POWER PLANT EQUIPMENT - MPP					353,649	445,598	0	0	-	-
390.00	STRUCTURES AND IMPROVEMENTS	11-2026	45-R3	*	(5)	95	100	0	0	-	-
391.00	OFFICE FURNITURE AND EQUIPMENT	11-2026	21-SQ	*	0	9,235	9,234	0	0	-	-
393.00	STORES EQUIPMENT	11-2026	27-SQ	*	0	3,000	3,000	0	0	-	-
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT PETERSBURG UNIT 3	05-2026	25-SQ	*	0	3,860	3,860	0	0	-	-
	PETERSBURG COMMON	11-2026	25-SQ	*	0	14,115	14,115	0	0	-	-
	TOTAL TOOLS, SHOP AND GARAGE EQUIPMENT					17,976	17,975	0	0	-	-
395.00	LABORATORY EQUIPMENT	11-2026	23-SQ	*	0	4,840	4,840	0	0	-	-
398.00	MISCELLANEOUS EQUIPMENT	11-2026	27-SQ	*	0	7,246	7,246	0	0	-	-
	TOTAL PETERSBURG STEAM PRODUCTION PLANT TO BE REFUELED					407,483,629	513,418,354	0	0	-	
	SEGREGATION OF PETERSBURG STEAM PRODUCTION TO BE AMORTIZED										
303.00	MISCELLANEOUS INTANGIBLE PLANT - SOFTWARE PETERSBURG UNITS 1 AND 2	12-2042	7-SQ	*	0	13,094	13,094	0	0	-	**
	PETERSBURG UNIT 3	12-2042	7-SQ	*	0	13,446	13,446	0	0	-	**
	PETERSBURG UNITS 3 AND 4	12-2042	7-SQ	*	0	5,273	5,273	0	0	-	**
	PETERSBURG COMMON	12-2042	7-SQ	*	0	108,645	108,645	0	0	-	**
	TOTAL MISCELLANEOUS INTANGIBLE PLANT - SOFTWARE					140,458	140,458	0	0	-	-
311.00	STRUCTURES AND IMPROVEMENTS PETERSBURG UNIT 2	12-2042	80-R2.5	*	(42)	35,615	50,573	0	0	-	**
	PETERSBURG UNITS 1 AND 2	12-2042	80-R2.5	*	(43)	6,278,998	8,978,968	0	0	-	**
	PETERSBURG UNIT 3	12-2042	80-R2.5	*	(44)	223,564	245,360	76,572	4,786	2.14	**
	PETERSBURG UNIT 4	12-2042	80-R2.5	*	(46)	165,011	157,821	83,094	5,193	3.15	**
	PETERSBURG COMMON	12-2042	80-R2.5	*	(43)	10,084,436	9,720,259	4,700,485	293,780	2.91	**
	TOTAL STRUCTURES AND IMPROVEMENTS					16,787,623	19,152,981	4,860,151	303,759	1.81	16.0
311.01	STRUCTURES AND IMPROVEMENTS - MPP PETERSBURG UNIT 3		18-SQ		(44)	433,113	623,682	0	0	-	**
	PETERSBURG UNIT 4		18-SQ		(46)	1,900,175	2,107,657	666,598	41,662	2.19	**
	TOTAL STRUCTURES AND IMPROVEMENTS - MPP					2,333,287	2,731,339	666,598	41,662	1.79	16.0
311.02	STRUCTURES AND IMPROVEMENTS - MATS PETERSBURG UNIT 3	12-2042	80-R2.5	*	(44)	557,758	469,742	333,429	20,839	3.74	**
	TOTAL STRUCTURES AND IMPROVEMENTS - MATS					557,758	469,742	333,429	20,839	3.74	16.0
312.00	BOILER PLANT EQUIPMENT PETERSBURG UNIT 2	12-2042	60-R1.5	*	(42)	528,292	750,175	0	0	-	**
	PETERSBURG UNITS 1 AND 2	12-2042	60-R1.5	*	(43)	16,239,653	22,564,369	658,334	41,146	0.25	**
	PETERSBURG UNIT 3	12-2042	60-R1.5	*	(44)	6,874,645	7,157,868	2,741,621	171,351	2.49	**
	PETERSBURG UNIT 4	12-2042	60-R1.5	*	(46)	2,334,698	2,328,539	1,080,119	67,507	2.89	**
	PETERSBURG UNITS 3 AND 4	12-2042	60-R1.5	*	(44)	83,086	76,696	42,948	2,684	3.23	**
	PETERSBURG COMMON	12-2042	60-R1.5	*	(43)	35,174,490	40,417,190	9,882,331	617,646	1.76	**
	TOTAL BOILER PLANT EQUIPMENT					61,234,864	73,294,837	14,405,353	900,334	1.47	16.0

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TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO ELECTRIC PLANT AS OF DECEMBER 31, 2026

ACCOUNT (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2026 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL		COMPOSITE REMAINING LIFE (10)=(7)/(8)
							AMOUNT (8)	RATE (9)=(8)/(5)	
312.01 BOILER PLANT EQUIPMENT - MPP									
PETERSBURG UNIT 3		18-SQ	(44)	160,974	195,876	35,926	2,245	1.39 **	16.0
PETERSBURG UNIT 4		18-SQ	(46)	21,809,728	24,191,159	7,651,044	478,190	2.19 **	16.0
TOTAL BOILER PLANT EQUIPMENT - MPP				21,970,702	24,387,035	7,686,970	480,435	2.19	16.0
312.02 BOILER PLANT EQUIPMENT - MATS									
PETERSBURG UNIT 3	12-2042	60-R1.5	* (44)	108,488,259	90,161,883	66,061,210	4,128,826	3.81 **	16.0
TOTAL BOILER PLANT EQUIPMENT - MATS				108,488,259	90,161,883	66,061,210	4,128,826	3.81	16.0
312.30 ASH AND COAL HANDLING EQUIPMENT									
PETERSBURG UNIT 3	12-2042	50-R1.5	* (44)	253,943	230,723	134,955	8,435	3.32 **	16.0
PETERSBURG UNIT 4	12-2042	50-R1.5	* (46)	1,055,879	760,069	781,515	48,845	4.63 **	16.0
PETERSBURG COMMON	12-2042	50-R1.5	* (43)	116,127	101,862	64,199	4,012	3.45 **	16.0
TOTAL ASH AND COAL HANDLING EQUIPMENT				1,425,949	1,092,654	980,669	61,292	4.30	16.0
314.00 TURBOGENERATOR UNITS									
PETERSBURG COMMON	12-2042	60-R1.5	* (43)	17,572	25,128	0	0	- **	16.0
TOTAL TURBOGENERATOR UNITS				17,572	25,128	0	0	-	-
315.00 ACCESSORY ELECTRIC EQUIPMENT									
PETERSBURG UNIT 2	12-2042	70-R2.5	* (42)	19,811	28,132	0	0	- **	16.0
PETERSBURG UNIT 3	12-2042	70-R2.5	* (44)	480,115	511,774	179,592	11,225	2.34 **	16.0
PETERSBURG UNIT 4	12-2042	70-R2.5	* (46)	186,328	186,017	86,021	5,376	2.89 **	16.0
PETERSBURG COMMON	12-2042	70-R2.5	* (43)	4,189,588	3,373,325	2,617,786	163,612	3.91 **	16.0
TOTAL ACCESSORY ELECTRIC EQUIPMENT				4,875,842	4,099,248	2,883,399	180,213	3.70	16.0
315.01 ACCESSORY ELECTRIC EQUIPMENT - MPP									
PETERSBURG UNIT 3		18-SQ	(44)	287,250	413,640	0	0	- **	16.0
PETERSBURG UNIT 4		18-SQ	(46)	2,489,010	2,760,787	873,167	54,573	2.19 **	16.0
TOTAL ACCESSORY ELECTRIC EQUIPMENT - MPP				2,776,260	3,174,427	873,167	54,573	1.97	16.0
316.00 MISCELLANEOUS POWER PLANT EQUIPMENT									
PETERSBURG UNIT 3	12-2042	60-S0.5	* (44)	114,706	148,946	16,230	1,014	0.88 **	16.0
PETERSBURG UNIT 4	12-2042	60-S0.5	* (46)	35,200	51,392	0	0	- **	16.0
PETERSBURG COMMON	12-2042	60-S0.5	* (43)	278,173	397,231	556	35	0.01 **	16.0
TOTAL MISCELLANEOUS POWER PLANT EQUIPMENT				428,079	597,569	16,786	1,049	0.25	16.0
316.01 MISCELLANEOUS POWER PLANT EQUIPMENT - MPP									
PETERSBURG UNIT 4		18-SQ	(46)	73,146	81,133	25,660	1,604	2.19 **	16.0
TOTAL MISCELLANEOUS POWER PLANT EQUIPMENT - MPP				73,146	81,133	25,660	1,604	2.19	16.0
353.01 STATION EQUIPMENT - MPP		18-SQ	0	428,081	325,222	102,859	6,429	1.50 **	16.0
391.00 OFFICE FURNITURE AND EQUIPMENT	12-2042	21-SQ	* 0	463	0	463	29	6.26 **	16.0
392.00 TRANSPORTATION EQUIPMENT	12-2042	13-L2	* 10	33,510	17,781	12,378	774	2.31 **	16.0
395.00 LABORATORY EQUIPMENT	12-2042	23-SQ	* 0	120,612	71,283	49,329	3,083	2.56 **	16.0
397.00 COMMUNICATION EQUIPMENT		18-SQ	0	153,697	72,451	81,246	5,078	3.30 **	16.0
398.00 MISCELLANEOUS EQUIPMENT	12-2042	27-SQ	* 0	2,558	458	2,100	131	5.12 **	16.0
TOTAL SEGREGATION OF PETERSBURG STEAM PRODUCTION TO BE AMORTIZED				221,848,721	219,895,629	99,041,767	6,190,110	2.79	
TOTAL DEPRECIABLE PLANT AND PLANT TO BE REFUELED				8,478,750,367	4,481,188,878	6,469,668,805	299,686,398	3.53	



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ACCOUNT		PROBABLE RETIREMENT DATE	SURVIVOR CURVE	NET SALVAGE PERCENT	ORIGINAL COST AS OF DECEMBER 31, 2026	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL	COMPOSITE REMAINING LIFE	
(1)		(2)	(3)	(4)	(5)	(6)	(7)	AMOUNT (8)	RATE (9)=(8)/(5)	(10)=(7)/(8)
NONDEPRECIABLE PLANT AND ACCOUNTS NOT STUDIED										
310.00	LAND				2,453,538					
317.00	ARO				305,769,303	212,201,765				
343.99	PRIME MOVERS (GL ACCOUNT 114)				1,185,145	248,845				
350.00	LAND				546,177					
359.10	ARO				30,196	29,642				
360.00	LAND				7,802,788	(3,132)				
360.99	LAND AND LAND RIGHTS - NON-UTILITY / FUTURE USE				105,447					
374.00	ARO				234,613	231,760				
389.00	REG ASSET				4,248,759					
389.99	LAND				305,009					
387.30	LAND AND LAND RIGHTS - NON-UTILITY / FUTURE USE				510,050,000					
390.99	STRUCTURES AND IMPROVEMENTS - NON-UTILITY / FUTURE USE				145,318	26,998				
399.10	ARO				692,516	681,689				
TOTAL NONDEPRECIABLE PLANT AND ACCOUNTS NOT STUDIED					833,568,808	213,417,567				
TOTAL ELECTRIC PLANT					9,312,319,175	4,694,606,445				

\* LIFE SPAN PROCEDURE IS USED. CURVE SHOWN IS INTERIM SURVIVOR CURVE.

\*\* ANNUAL ACCRUAL RATE BASED ON AMORTIZATION OVER THE REMAINING LIFE OF PETERSBURG

^ Balance adjusted in accordance with the direct testimony and exhibits of OUCC Witness Kelley

**AES - Indiana**

**352.00 - Structures and Improvements**

**Calculation of Remaining Life  
Based Upon Broad Group/Vintage Group Procedures  
Related to Original Cost as of December 31, 2026**

**Survivor Curve .. IOWA:**

**75**

**R3**

<b><u>Year</u></b> <b>(1)</b>	<b><u>Age</u></b> <b>(2)</b>	<b><u>Surviving</u></b> <b><u>Investment</u></b> <b>(3)</b>	<b>BG/VG Average</b>		<b><u>ASL</u></b> <b><u>Weights</u></b> <b>(6)=(3)/(4)</b>	<b><u>RL</u></b> <b><u>Weights</u></b> <b>(7)=(6)*(5)</b>
			<b><u>Service</u></b> <b><u>Life</u></b> <b>(4)</b>	<b><u>Remaining</u></b> <b><u>Life</u></b> <b>(5)</b>		
2026	0.5	5,689,039.82	75	74.51	75,854	5,651,871
2025	1.5	3,167,563.53	75	73.52	42,234	3,105,057
2024	2.5	1,680,671.67	75	72.54	22,409	1,625,546
2023	3.5	476,004.60	75	71.56	6,347	454,172
2022	4.5	192,891.60	75	70.58	2,572	181,524
2021	5.5	0.00	75	69.61	0	0
2020	6.5	0.00	75	68.63	0	0
2019	7.5	0.00	75	67.66	0	0
2018	8.5	51,746.51	75	66.69	690	46,013
2017	9.5	0.00	75	65.72	0	0
2016	10.5	16,832,482.84	75	64.76	224,433	14,534,288
2015	11.5	1,689,629.71	75	63.8	22,528	1,437,312
2014	12.5	2,602.65	75	62.84	35	2,181
2013	13.5	55,405.11	75	61.89	739	45,720
2012	14.5	14,088.82	75	60.94	188	11,448
2011	15.5	10,857.09	75	59.99	145	8,684
2010	16.5	51,741.07	75	59.05	690	40,737
2009	17.5	3,059.40	75	58.11	41	2,370
2008	18.5	0.00	75	57.17	0	0
2007	19.5	6,793.20	75	56.24	91	5,094
2006	20.5	52,925.10	75	55.31	706	39,030
2005	21.5	4,220.92	75	54.39	56	3,061
2004	22.5	95,711.88	75	53.47	1,276	68,236
2003	23.5	0.00	75	52.56	0	0
2002	24.5	0.00	75	51.65	0	0
2001	25.5	42,405.99	75	50.74	565	28,689
2000	26.5	0.00	75	49.85	0	0
1999	27.5	66,404.00	75	48.95	885	43,340

1998	28.5	0.00	75	48.06	0	0
1997	29.5	2,366.11	75	47.18	32	1,488
1996	30.5	60,640.90	75	46.31	809	37,444
1995	31.5	20,203.96	75	45.44	269	12,241
1994	32.5	158,281.23	75	44.57	2,110	94,061
1993	33.5	18,698.58	75	43.71	249	10,898
1992	34.5	1,395.13	75	42.86	19	797
1991	35.5	91,237.90	75	42.02	1,217	51,118
1990	36.5	45,700.22	75	41.18	609	25,092
1989	37.5	0.00	75	40.34	0	0
1988	38.5	6,074.51	75	39.52	81	3,201
1987	39.5	47,600.92	75	38.7	635	24,562
1986	40.5	12,762.00	75	37.88	170	6,446
1985	41.5	34,401.40	75	37.08	459	17,008
1984	42.5	0.00	75	36.28	0	0
1983	43.5	30,151.78	75	35.49	402	14,268
1982	44.5	0.00	75	34.7	0	0
1981	45.5	0.00	75	33.92	0	0
1980	46.5	0.00	75	33.15	0	0
1979	47.5	0.00	75	32.39	0	0
1978	48.5	0.00	75	31.64	0	0
1977	49.5	369,951.40	75	30.89	4,933	152,371
1976	50.5	176,255.99	75	30.15	2,350	70,855
1975	51.5	3,470.08	75	29.42	46	1,361
1974	52.5	5,796.79	75	28.7	77	2,218
1973	53.5	150,348.73	75	27.98	2,005	56,090
1972	54.5	71,871.51	75	27.28	958	26,142
1971	55.5	153,661.10	75	26.58	2,049	54,457
1970	56.5	65,784.67	75	25.89	877	22,709
1969	57.5	203,652.85	75	25.22	2,715	68,482
1968	58.5	14,460.95	75	24.55	193	4,734
1967	59.5	239,859.02	75	23.89	3,198	76,403
1966	58.5	0.00	75	23.24	0	0
1965	59.5	0.00	75	22.6	0	0
1964	60.5	0.00	75	23.89	0	0
1963	61.5	168,050.64	75	23.89	2,241	53,530
		32,338,924			431,186	28,222,349

AVERAGE SERVICE LIFE	75
AVERAGE REMAINING LIFE	65.45

**AES - Indiana**

**354.00 - Towers and Fixtures**

**Calculation of Remaining Life  
Based Upon Broad Group/Vintage Group Procedures  
Related to Original Cost as of December 31, 2026**

**Survivor Curve .. IOWA:                      80                      R4**

<u><b>Year</b></u> <b>(1)</b>	<u><b>Age</b></u> <b>(2)</b>	<u><b>Surviving Investment</b></u> <b>(3)</b>	<b>BG/VG Average</b>		<u><b>ASL Weights</b></u> <b>(6)=(3)/(4)</b>	<u><b>RL Weights</b></u> <b>(7)=(6)*(5)</b>
			<u><b>Service</b></u> <u><b>Life</b></u> <b>(4)</b>	<u><b>Remaining</b></u> <u><b>Life</b></u> <b>(5)</b>		
2026	0.5	0	80	79.5	0	0
2025	1.5	3,027,180.55	80	78.5	37,840	2,970,421
2024	2.5	686,171.65	80	77.5	8,577	664,729
2023	3.5	0.00	80	76.5	0	0
2022	4.5	3,599,979.06	80	75.5	45,000	3,397,480
2021	5.5	0.00	80	74.51	0	0
2020	6.5	0.00	80	73.51	0	0
2019	7.5	0.00	80	72.51	0	0
2018	8.5	0.00	80	71.51	0	0
2017	9.5	2,724,569.54	80	70.52	34,057	2,401,708
2016	10.5	0.00	80	69.52	0	0
2015	11.5	1,289,307.94	80	68.53	16,116	1,104,453
2014	12.5	0.00	80	67.53	0	0
2013	13.5	2.05	80	66.54	0	2
2012	14.5	1,239,225.71	80	65.54	15,490	1,015,236
2011	15.5	0.00	80	64.55	0	0
2010	16.5	0.00	80	63.56	0	0
2009	17.5	67,608.25	80	62.57	845	52,878
2008	18.5	872,855.15	80	61.58	10,911	671,880
2007	19.5	0.00	80	60.59	0	0
2006	20.5	0.00	80	59.61	0	0
2005	21.5	0.00	80	58.62	0	0
2004	22.5	554,716.53	80	57.64	6,934	399,673
2003	23.5	0.00	80	56.66	0	0
2002	24.5	0.00	80	55.68	0	0
2001	25.5	176,232.87	80	54.7	2,203	120,499
2000	26.5	0.00	80	53.73	0	0
1999	27.5	0.00	80	52.76	0	0

1998	28.5	45,736.96	80	51.79	572	29,609
1997	29.5	0.00	80	50.83	0	0
1996	30.5	506,699.53	80	49.87	6,334	315,864
1995	31.5	661,004.23	80	48.91	8,263	404,121
1994	32.5	118,157.16	80	47.96	1,477	70,835
1993	33.5	706,222.93	80	47.01	8,828	414,994
1992	34.5	42,296.81	80	46.06	529	24,352
1991	35.5	479,797.51	80	45.12	5,997	270,606
1990	36.5	595,021.57	80	44.19	7,438	328,675
1989	37.5	48,366.18	80	43.26	605	26,154
1988	38.5	7,568,354.66	80	42.34	94,604	4,005,552
1987	39.5	681,596.60	80	41.42	8,520	352,897
1986	40.5	0.00	80	40.51	0	0
1985	41.5	3,933,516.45	80	39.6	49,169	1,947,091
1984	42.5	0.00	80	38.7	0	0
1983	43.5	8,039.19	80	37.81	100	3,800
1982	44.5	84,781.32	80	36.93	1,060	39,137
1981	45.5	0.00	80	36.05	0	0
1980	46.5	74,261.01	80	35.18	928	32,656
1979	47.5	9,320,879.23	80	34.32	116,511	3,998,657
1978	48.5	391,178.18	80	33.47	4,890	163,659
1977	49.5	2,061,745.68	80	32.63	25,772	840,935
1976	50.5	0.00	80	31.79	0	0
1975	51.5	153,962.22	80	30.97	1,925	59,603
1974	52.5	2,088,812.75	80	30.15	26,110	787,221
1973	53.5	885,293.70	80	29.34	11,066	324,681
1972	54.5	2,107,805.98	80	28.54	26,348	751,960
1971	55.5	0.00	80	27.75	0	0
1970	56.5	1,527,958.54	80	26.97	19,099	515,113
1969	57.5	3,892,897.68	80	26.2	48,661	1,274,924
1968	58.5	0.00	80	25.44	0	0
1967	59.5	51,186.44	80	24.69	640	15,797
1966	60.5	35,869.60	80	23.95	448	10,738
1965	61.5	17,850.05	80	23.22	223	5,181
1964	62.5	30,696.69	80	22.49	384	8,630
1963	63.5	30,082.55	80	21.78	376	8,190
1962	64.5	1,989.86	80	21.07	25	524
1961	65.5	3,830.65	80	20.37	48	975
1960	66.5	14,081.11	80	19.69	176	3,466
1959	67.5	19,781.31	80	19.01	247	4,701
1958	68.5	4,655.32	80	18.34	58	1,067
1957	69.5	0.00	80	17.67	0	0
1956	70.5	0.00	80	17.02	0	0
1955	71.5	37,025.54	80	16.39	463	7,586

1954	72.5	29,428.14	80	15.77	368	5,801
1953	73.5	5,598.49	80	15.16	70	1,061
1952	74.5	101,253.51	80	14.58	1,266	18,453
1951	75.5	528,805.45	80	14.01	6,610	92,607
1950	76.5	0.00	80	13.47	0	0
1949	77.5	0.00	80	12.94	0	0
1948	78.5	0.00	80	12.43	0	0
1947	79.5	0.00	80	11.95	0	0
1946	80.5	0.00	80	11.48	0	0
1945	81.5	529.6	80	11.04	7	73
1944	82.5	258.01	80	10.61	3	34
1943	83.5	0.00	80	10.2	0	0
1942	84.5	2,525.83	80	9.81	32	310
1941	85.5	1,220.94	80	9.43	15	144
1940	86.5	0.00	80	9.07	0	0
1939	87.5	0.00	80	8.72	0	0
1938	88.5	0.00	80	8.39	0	0
1937	89.5	0.00	80	8.06	0	0
1936	90.5	0.00	80	7.75	0	0
1935	91.5	0.00	80	7.44	0	0
1934	92.5	645,842.57	80	7.14	8,073	57,641
1933	93.5	0.00	80	6.85	0	0
1932	94.5	647,142.91	80	6.56	8,089	53,066
		51,404,709			680,399	30,078,101

AVERAGE SERVICE LIFE	80
AVERAGE REMAINING LIFE	44.21

**AES - Indiana**

**355.00 - Poles and Fixtures**

**Calculation of Remaining Life  
Based Upon Broad Group/Vintage Group Procedures  
Related to Original Cost as of December 31, 2026**

**Survivor Curve .. IOWA: 70 R2**

<u>Year</u> (1)	<u>Age</u> (2)	<u>Surviving Investment</u> (3)	<u>BG/VG Average</u>		<u>ASL Weights</u> (6)=(3)/(4)	<u>RL Weights</u> (7)=(6)*(5)
			<u>Service</u> <u>Life</u> (4)	<u>Remaining</u> <u>Life</u> (5)		
2026	0.5	0	70	69.55	0	0
2025	1.5	8,859,995.98	70	68.64	126,571	8,687,859
2024	2.5	512,505.31	70	67.74	7,322	495,959
2023	3.5	2,089,516.03	70	66.85	29,850	1,995,488
2022	4.5	0.00	70	65.95	0	0
2021	5.5	3,098,854.27	70	65.07	44,269	2,880,606
2020	6.5	2,203,457.45	70	64.18	31,478	2,020,256
2019	7.5	960,724.27	70	63.3	13,725	868,769
2018	8.5	8,770,590.38	70	62.42	125,294	7,820,861
2017	9.5	3,908,004.07	70	61.55	55,829	3,436,252
2016	10.5	3,694,688.07	70	60.68	52,781	3,202,767
2015	11.5	2,244,915.06	70	59.82	32,070	1,918,440
2014	12.5	1,255,132.21	70	58.96	17,930	1,057,180
2013	13.5	97,368.91	70	58.1	1,391	80,816
2012	14.5	3,487,569.44	70	57.25	49,822	2,852,334
2011	15.5	273,176.82	70	56.41	3,903	220,141
2010	16.5	118,964.43	70	55.56	1,699	94,424
2009	17.5	192,979.84	70	54.73	2,757	150,883
2008	18.5	52,129.36	70	53.9	745	40,140
2007	19.5	139,069.92	70	53.07	1,987	105,435
2006	20.5	99,983.26	70	52.25	1,428	74,630
2005	21.5	430,611.85	70	51.43	6,152	316,377
2004	22.5	486,058.75	70	50.62	6,944	351,490
2003	23.5	385,604.40	70	49.81	5,509	274,385
2002	24.5	215,056.21	70	49.01	3,072	150,570
2001	25.5	582,624.01	70	48.21	8,323	401,261
2000	26.5	97,829.87	70	47.42	1,398	66,273
1999	27.5	284,853.91	70	46.63	4,069	189,753

1998	28.5	767,685.24	70	45.85	10,967	502,834
1997	29.5	287,429.54	70	45.08	4,106	185,105
1996	30.5	1,882,756.04	70	44.31	26,897	1,191,785
1995	31.5	559,514.66	70	43.54	7,993	348,018
1994	32.5	1,652,845.09	70	42.78	23,612	1,010,124
1993	33.5	104,676.66	70	42.03	1,495	62,851
1992	34.5	197,526.09	70	41.29	2,822	116,512
1991	35.5	1,280,342.38	70	40.55	18,291	741,684
1990	36.5	329,254.94	70	39.81	4,704	187,252
1989	37.5	722,566.26	70	39.08	10,322	403,398
1988	38.5	119,967.63	70	38.36	1,714	65,742
1987	39.5	349,576.89	70	37.65	4,994	188,022
1986	40.5	5,196.27	70	36.94	74	2,742
1985	41.5	320,186.03	70	36.24	4,574	165,765
1984	42.5	124,217.73	70	35.54	1,775	63,067
1983	43.5	8,351.63	70	34.85	119	4,158
1982	44.5	446,039.12	70	34.17	6,372	217,731
1981	45.5	20,243.16	70	33.5	289	9,688
1980	46.5	84,486.43	70	32.83	1,207	39,624
1979	47.5	2,130,302.95	70	32.17	30,433	979,026
1978	48.5	20,824.93	70	31.51	297	9,374
1977	49.5	75,874.35	70	30.87	1,084	33,461
1976	50.5	441,525.64	70	30.23	6,308	190,676
1975	51.5	355,439.98	70	29.6	5,078	150,300
1974	52.5	483,590.74	70	28.97	6,908	200,137
1973	53.5	611,260.81	70	28.36	8,732	247,648
1972	54.5	15,679.57	70	27.75	224	6,216
1971	55.5	268,035.27	70	27.15	3,829	103,959
1970	56.5	66,150.34	70	26.56	945	25,099
1969	57.5	167,904.73	70	25.97	2,399	62,293
1968	58.5	7,552.16	70	25.4	108	2,740
1967	59.5	344.08	70	24.83	5	122
1966	60.5	69,462.53	70	24.27	992	24,084
1965	61.5	47,604.14	70	23.71	680	16,124
1964	62.5	558,989.45	70	23.17	7,986	185,026
1963	63.5	88,402.69	70	22.64	1,263	28,592
1962	64.5	2,055.41	70	22.11	29	649
1961	65.5	206.97	70	21.59	3	64
1960	66.5	2,050.46	70	21.08	29	617
1959	67.5	284.27	70	20.58	4	84
1958	68.5	41,158.95	70	20.09	588	11,813
1957	69.5	86.65	70	19.6	1	24
1956	70.5	207.44	70	19.13	3	57
1955	71.5	598,838.61	70	18.66	8,555	159,633



1954	72.5	249,315.02	70	18.2	3,562	64,822
1953	73.5	90.84	70	17.75	1	23
1952	74.5	18,438.59	70	17.31	263	4,560
1951	75.5	91.55	70	16.88	1	22
1950	76.5	18,582.48	70	16.45	265	4,367

51,285,481

859,221 47,771,063

AVERAGE SERVICE LIFE

70

AVERAGE REMAINING LIFE

55.60

**AES - Indiana**

**356.00 - Overhead Conductors and Devices**

**Calculation of Remaining Life  
Based Upon Broad Group/Vintage Group Procedures  
Related to Original Cost as of December 31, 2026**

**Survivor Curve .. IOWA: 70 R2**

<u>Year</u> (1)	<u>Age</u> (2)	<u>Surviving Investment</u> (3)	<u>BG/VG Average</u>		<u>ASL Weights</u> (6)=(3)/(4)	<u>RL Weights</u> (7)=(6)*(5)
			<u>Service</u> <u>Life</u> (4)	<u>Remaining</u> <u>Life</u> (5)		
2026	0.5	9,998,164.06	70	69.55	142,831	9,933,890
2025	1.5	5,864,861.38	70	68.64	83,784	5,750,916
2024	2.5	3,224,591.37	70	67.74	46,066	3,120,483
2023	3.5	7,881,324.32	70	66.85	112,590	7,526,665
2022	4.5	2,109,606.05	70	65.95	30,137	1,987,550
2021	5.5	801,236.74	70	65.07	11,446	744,807
2020	6.5	4,873,974.48	70	64.18	69,628	4,468,738
2019	7.5	80,843.49	70	63.3	1,155	73,106
2018	8.5	256,081.03	70	62.42	3,658	228,351
2017	9.5	131,378.88	70	61.55	1,877	115,520
2016	10.5	7,938,435.64	70	60.68	113,406	6,881,490
2015	11.5	287,836.25	70	59.82	4,112	245,977
2014	12.5	640,256.91	70	58.96	9,147	539,279
2013	13.5	908,986.36	70	58.1	12,986	754,459
2012	14.5	1,017,626.28	70	57.25	14,538	832,273
2011	15.5	25,697.52	70	56.41	367	20,709
2010	16.5	2,378,616.70	70	55.56	33,980	1,887,942
2009	17.5	509,742.83	70	54.73	7,282	398,546
2008	18.5	165,920.89	70	53.9	2,370	127,759
2007	19.5	121,266.55	70	53.07	1,732	91,937
2006	20.5	728,543.42	70	52.25	10,408	543,806
2005	21.5	136,583.11	70	51.43	1,951	100,350
2004	22.5	110,873.62	70	50.62	1,584	80,177
2003	23.5	467,044.69	70	49.81	6,672	332,336
2002	24.5	475,795.64	70	49.01	6,797	333,125
2001	25.5	254,003.74	70	48.21	3,629	174,936
2000	26.5	190,541.79	70	47.42	2,722	129,078
1999	27.5	493,896.20	70	46.63	7,056	329,005

1998	28.5	4,823.13	70	45.85	69	3,159
1997	29.5	304,716.84	70	45.08	4,353	196,238
1996	30.5	503,439.05	70	44.31	7,192	318,677
1995	31.5	473,869.40	70	43.54	6,770	294,747
1994	32.5	2,974,627.90	70	42.78	42,495	1,817,923
1993	33.5	661,123.96	70	42.03	9,445	396,958
1992	34.5	1,505,055.78	70	41.29	21,501	887,768
1991	35.5	1,160,778.47	70	40.55	16,583	672,422
1990	36.5	75,519.81	70	39.81	1,079	42,949
1989	37.5	440,857.81	70	39.08	6,298	246,125
1988	38.5	684,319.37	70	38.36	9,776	375,007
1987	39.5	613,395.67	70	37.65	8,763	329,919
1986	40.5	2,420,870.82	70	36.94	34,584	1,277,528
1985	41.5	953,071.75	70	36.24	13,615	493,419
1984	42.5	3,505.13	70	35.54	50	1,780
1983	43.5	3,481,876.50	70	34.85	49,741	1,733,477
1982	44.5	278,611.54	70	34.17	3,980	136,002
1981	45.5	12,953.70	70	33.5	185	6,199
1980	46.5	603,240.49	70	32.83	8,618	282,920
1979	47.5	24,714.82	70	32.17	353	11,358
1978	48.5	264,362.00	70	31.51	3,777	119,001
1977	49.5	7,409,231.47	70	30.87	105,846	3,267,471
1976	50.5	182,276.00	70	30.23	2,604	78,717
1975	51.5	1,397,709.87	70	29.6	19,967	591,032
1974	52.5	412,903.68	70	28.97	5,899	170,883
1973	53.5	505,015.49	70	28.36	7,215	204,603
1972	54.5	2,143,990.57	70	27.75	30,628	849,939
1971	55.5	1,518,362.71	70	27.15	21,691	588,908
1970	56.5	964,822.52	70	26.56	13,783	366,081
1969	57.5	364,374.75	70	25.97	5,205	135,183
1968	58.5	1,516,531.41	70	25.4	21,665	550,284
1967	59.5	3,870,746.44	70	24.83	55,296	1,373,009
1966	60.5	3,237.07	70	24.27	46	1,122
1965	61.5	268,852.09	70	23.71	3,841	91,064
1964	62.5	147,109.34	70	23.17	2,102	48,693
1963	63.5	78,664.88	70	22.64	1,124	25,442
1962	64.5	366,633.24	70	22.11	5,238	115,804
1961	65.5	172,402.95	70	21.59	2,463	53,174
1960	66.5	1,311.84	70	21.08	19	395
1959	67.5	10.58	70	20.58	0	3
1958	68.5	30,410.25	70	20.09	434	8,728
1957	69.5	15,244.66	70	19.6	218	4,269
1956	70.5	277,441.26	70	19.13	3,963	75,821
1955	71.5	0.00	70	18.66	0	0

1954	72.5	0.00	70	18.2	0	0
1953	73.5	418,231.61	70	17.75	5,975	106,052
1952	74.5	143,326.83	70	17.31	2,048	35,443
1951	75.5	13,990.01	70	16.88	200	3,374
1950	76.5	30,137.38	70	16.45	431	7,082
1949	77.5	87,295.74	70	16.04	1,247	20,003
1948	78.5	64.6	70	15.63	1	14
1947	79.5	0	70	15.22	0	0
1946	80.5	0	70	14.83	0	0
1945	81.5	0	70	14.45	0	0
1944	82.5	0	70	14.07	0	0
1943	83.5	0	70	13.7	0	0
1942	84.5	0	70	13.33	0	0
1941	85.5	0	70	12.97	0	0
1940	86.5	0	70	12.62	0	0
1939	87.5	0	70	12.28	0	0
1938	88.5	0	70	11.94	0	0
1937	89.5	0	70	11.61	0	0
1936	90.5	0	70	11.28	0	0
1935	91.5	0	70	10.95	0	0
1934	92.5	0	70	10.64	0	0
1933	93.5	0	70	10.32	0	0
1932	94.5	36,507.58	70	10.01	522	5,221

91,896,301

1,312,804 66,174,598

AVERAGE SERVICE LIFE

70

AVERAGE REMAINING LIFE

50.41

**Data Request OUCC DR 26 - 8**

Please provide all notes (written or electronic) Mr. Spanos took during any meetings with Company personnel regarding the depreciation study.

**Objection:**

AES Indiana objects to the request on the grounds and to the extent the request is overly broad and unduly burdensome, particularly to the extent the request seeks “all notes”. Subject to and without waiver of the foregoing objection, AES Indiana provides the following response.

**Response:**

This study was an update to the 2022 study which was only two years ago. Therefore, all discussions related to the impact in the last couple of years related to proper recovery of the generating facilities. The 2022 notes and photos are provided as the attachments below.

OUCC DR 26-8 Attachment 1 (Notes)

OUCC DR 26-8 Attachment 2 (Photos)

## **Indianapolis Power and Light**

### **2/28 to 3/1/2023 Field Trip Notes**

**Tuesday, February 28, 2023**

#### **Eagle Valley CCGT Station (8:00am – Mark Holbrook and Eric Gilky)**

1. General discussion
  - a. 2 failures in 2021 on generator
  - b. 40-year estimated life
  - c. 1 steam turbine, 2 gas turbines
  - d. First hot gas path inspection will be April 2023 (part of LTSA)
  - e. 660 MWs to 735 MWs
  - f. Steam and Gas Units can run individually
  - g. 2 WHs associated with old steam plant still in service
  - h. Major outage planned in 2027 for steam turbine
    - i. Split will be 80% capital and 20% LTSA
  - i. Water treatment is 2 RO systems
  - j. Gas supplier is Vectren
  - k. 2 WHs built on site in 2022 (1 for parts, 1 for equipment)
  - l. Gas turbines are GE, Steam turbine is Toshiba

#### **Camby Substation (9:45am – Roderick “Rod” Cornwell)**

1. 138 KV in, 13.2 KV out
2. 2 lines, 2 transformers<sup>3</sup>
3. 1 line in from EV, 1 line in from HSS
4. Station configuration is pretty consistent with other stations on the system
5. Communication goes to Morris Street Service Center
6. Maintenance program for batteries is 5 to 7-year changeout
7. Most new stations will have a prefab control house (began in 2020)

#### **Glenns Valley Substation (10:40am – Roderick “Rod” Cornwell)**

1. 138 KV in, 13.2 KV out
2. Station is vintage mid-1970s
3. Substation inspection program (every station is inspected every quarter)
4. Very similar to Camby Substation

#### **Petersburg Station (1:45pm – Charles Duncan)**

1. General discussion
  - a. Large investments from around 2017 were related to the addition of the new Water Treatment Facility and the Submerged Flight Conveyor System (Ash Processing) Facility
  - b. SBS injection on all units
  - c. Planning to retire Unit 2 in June of 2023
  - d. Planning to convert Units 3 and 4 from Coal Fired to Gas Fired in 2025

## **Indianapolis Power and Light**

### **2/28 to 3/1/2023 Field Trip Notes**

- i. Will add an auxiliary boiler as part of the conversion
- e. Coal is delivered by rail and truck

**Wednesday, March 1, 2023**

#### **Harding Street Station (8:30am – Greg Ellis)**

1. General Discussion
  - a. 3 steam units remain (5, 6 and 7) – all have been converted to gas fired in 2015/2016 time frame
  - b. Units 5 and 6 are 105 MWs each
  - c. Unit 7 is 450 MWs
  - d. 6 Gas Turbine Units
    - i. Units 1 and 2 are oil fired and are about 20MWs each
    - ii. Unit 3 has been retired
    - iii. Units 4 and 5 are about 75/80 MWs each
    - iv. Unit 6 is 170 MWs
  - e. Plant is load driven
  - f. Steam Unit 7 has had DCS Controls upgrade
  - g. There were controls changes/upgrades for the steam units with conversion to gas
  - h. Updated retirement plans are:
    - i. Units 5 and 6 in 2031
    - ii. Unit 7 in 2034
  - i. Future Plans
    - i. Steam Unit 6 overhaul in 2023
    - ii. Steam Unit 5 GSU replacement in 2025
    - iii. Steam Unit 7 Superheater Replacement in 2024
    - iv. Steam Unit 7 GSU is currently being replaced under a warranty claim
    - v. Buying Refurb spare parts for GTs to keep outages under 30 days

#### **Georgetown Station (10:15am – Greg Ellis)**

1. IPL own Units 1 and 4, but operates and maintains all 4 units
2. 2022 work
  - a. CI on GT4
3. 2019 failure on GT1
4. Units are running more, but still load driven (not baseload)
5. Gas supplier is Citizens

## **Indianapolis Power and Light**

### **2/28 to 3/1/2023 Field Trip Notes**

#### **6. Future Plans**

- a. NOx improvements
- b. Hardware improvements resulting from increased runs



ITINERARY FOR  
JOHN J. SPANOS & FRED B. JOHNSTON

February 27 – March 1, 2023

Monday, February 27, 2023

**American Airlines – Confirmation Check-in VAKRVB (JJS); IKIFUY (FBJ)**

Leave	Harrisburg, PA	AA #6098	4:51 pm
Arrive	Philadelphia, PA	Seat 10A; 11B	5:45 pm
Leave	Philadelphia, PA	AA #1337	6:40 pm
Arrive	Indianapolis, IN	Seat 10C; 10D	8:49 pm

CAR: National Car Rental

**CONFIRMATION: 1446477984EXSEL**

HOTEL: Hampton Inn  
9020 Hatfield Drive  
Indianapolis, IN 46241  
1-317-856-1000

**CONFIRMATION: 96682090 (JJS)  
95896106 (FBJ)**

Tuesday, February 28, 2023

Meet at 8:00am at Eagle Valley Generating Facility

PURPOSE: Indianapolis Power & Light Site Visit  
One Monument Circle  
Indianapolis, IN 46204

CONTACTS: Alex Halter(EV) 317-494-9934  
Charles Duncan(Petersburg) 812-601-7268(w) 812-459-9657(C)  
Greg Ellis (Harding St) 317-261-5584(w) 317-474-5610 (C)  
Mike Coppens(Substations) 812-840-0094

Wednesday, March 1, 2023

Meet at 8:00 am at Harding Street Generating Facility

**American Airlines – Confirmation Check-in VAKRVB (JJS); IKIFUY (FBJ)**

Leave	Indianapolis, IN	AA #1589	3:18 pm
Arrive	Charlotte, NC	Seat 15C; 15D	4:51 pm
Leave	Charlotte, NC	AA #5232	6:00 pm
Arrive	Harrisburg, PA	Seat 11C; 11F	7:34 pm

Eagle Valley Station: 4040 Blue Bluff Road, Martinsville, IN 46151  
Petersburg Station: 6925 N. State Road 57, Petersburg, IN 47567  
Harding Street Station: 3700 S. Harding Street, Indianapolis, IN 46217

## Spanos, John J.

**From:** gannettfleming@worldtravelinc.com  
**Sent:** Saturday, February 25, 2023 7:16 PM  
**To:** Spanos, John J.; Eckrich, Megan L.; Rutter, Cheryl A.  
**Subject:** Ticketed Invoice for SPANOS/JOHN J departing 2/27/2023  
**Attachments:** Ticketed Invoice for SPANOS\_JOHN J departing 2\_27\_2023.pdf; Car-National Rent A Car-Indianapolis-ZP1CRG-27FEB.ics; Hotel-Indianapolis-ZP1CRG-27FEB.ics; Air-AA6098-ZP1CRG-MDTPHL-27Feb.ics; Air-AA1337-ZP1CRG-PHLIND-27Feb.ics; Air-AA1589-ZP1CRG-INDCLT-01Mar.ics; Air-AA5232-ZP1CRG-CLTMDT-01Mar.ics

**[EXTERNAL EMAIL]:** This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



### World Travel Record Locator : ZP1CRG

Passenger  
SPANOS / JOHN J



Rate Your Experience

Please review your itinerary upon receipt. World Travel Inc. will not be responsible for any discrepancies on this itinerary if not notified within 24 hours of when reservation was made.

**Global health and entry requirements are subject to change without notice. Please check and observe all health and entry requirements applicable to your journey. It remains recommended to verify the latest travel guidance from your government and requirements from Public, State & Foreign authorities of your destination up through the date & time of departure.**

[Click here for WorldALERT360](#) to access a curated list of COVID 19 resources.

### Important Trip Information

Assigned Company Number	003
Assigned Organization Code	331050
GL Account Code	405500

Class: **Economy**

Estimated Time: **2 hour(s) and 9 minute(s) Non-stop**

Distance: **587**

CO2 Emissions: **240 kg/0.24 metric tons**

Equipment: **Airbus Industrie A319**

Seat: **10C (Non smoking) Confirmed**



## National Rent A Car

MON, FEB 27, 2023

PICK UP

MON, FEB 27, 2023

DROP OFF

WED, MAR 1, 2023

Status:

Confirmed

Confirmation: **1446477984EXSEL**



7801 Col H Weir Cook Mem  
7801 Col H Weir Cook Mem Dr  
Indianapolis, IN 46241-8011  
United States

Duration: **2 Days**

Mileage: **Unlimited**



+1 (833) 315-5898

Type: **Intermediate 2/4 Door Automatic Air Conditioning**

Corp. Discount: **XZ57291**

Frequent Traveler ID: **914456734**

Rate: **USD 39.5 per day additional local taxes and insurance costs may apply**

Total: **USD 114.79 Approximate including Taxes**

**Note: National and Enterprise rates include insurance for US rentals, when traveling outside of the US please purchase insurance when picking up your rental car. If renting car inside the United States, employees must not purchase insurance.**



## Hampton Inn Andamp Suites Indianap

MON, FEB 27, 2023

CHECK IN DATE

MON, FEB 27, 2023

CHECK OUT DATE

WED, MAR 1, 2023

Status:

Confirmed

Confirmation: **96682090**



9020 Hatfield Drive  
Indianapolis, IN 46241  
United States

Persons: **1**

Number of **2**

Nights:

DEPARTURE  
6:00 PM

ARRIVAL  
7:34 PM

Status: Confirmed  
Confirmation: VAKRVB  
Frequent RY18656  
Traveler ID:



Directions - CLT

Class: Economy

Estimated Time: 1 hour(s) and 34 minute(s) Non-stop

Distance: 413

CO2 Emissions: 175 kg/0.17 metric tons

Equipment: Canadair Regional Jet 900

Seat: 11C (Non smoking) Confirmed



## Remarks

TRIP ARRANGED BY LISA CRISTOFICH

## Invoice

Invoice Number: 215467702

Invoice Issued: 2/16/2023

Ticket Number: 0017861230520



American Airlines Flight 6098 - February 27



American Airlines Flight 1337 - February 27



American Airlines Flight 1589 - March 01



American Airlines Flight 5232 - March 01

Base Fare

\$790.70 USD

Total Tax

\$106.20 USD

Total Ticket Amount

\$896.90 USD

Form of Payment

VI448538XXXXXX0128

Issue Date

2/16/2023

Form of Payment

VI448538XXXXXX0128

Service Fee Number

8900835223213

6525 Trotter Rd

**Tuesday 2/28, 1000hrs**

Glens Valley Substation  
1940 W. Banta Rd

**Tuesday 2/28, 1030hrs (optional)**

Edgewood Substation  
1801 E. Edgewood Ave

Please let us know if there are any changes to your schedule tomorrow.

MTC

---

*Michael T. Coppens*

Manager, Substation & Network Field Operations

AES Indiana

1230 W. Morris St., Indianapolis, IN 46221

[michael.coppens@aes.com](mailto:michael.coppens@aes.com)

812.840.0094



---

From: Spanos, John J. <[jspanos@GFNET.com](mailto:jspanos@GFNET.com)>

Sent: Saturday, February 25, 2023 11:02 AM

To: Gregory Ellis <[gregory.ellis@aes.com](mailto:gregory.ellis@aes.com)>

Cc: Gerardo Hernandez <[gerardo.hernandez@aes.com](mailto:gerardo.hernandez@aes.com)>; John Arose <[john.rose@aes.com](mailto:john.rose@aes.com)>; Mark Holbrook

<[mark.holbrook@aes.com](mailto:mark.holbrook@aes.com)>; Steven Barnoski <[steven.barnoski@aes.com](mailto:steven.barnoski@aes.com)>; Roderick Conwell

<[roderick.conwell@aes.com](mailto:roderick.conwell@aes.com)>; Alexander Halter <[alexander.halter@aes.com](mailto:alexander.halter@aes.com)>; Susan Woodard

<[susan.woodard@aes.com](mailto:susan.woodard@aes.com)>; Martina Salatino <[martina.salatino@aes.com](mailto:martina.salatino@aes.com)>; Kristi Figg <[kristi.igg@aes.com](mailto:kristi.igg@aes.com)>; Michael

Coppens <[michael.coppens@aes.com](mailto:michael.coppens@aes.com)>; Johnston Jr., Frederick B. <[fjohnston@GFNET.com](mailto:fjohnston@GFNET.com)>; Charles Duncan

<[charles.duncan@aes.com](mailto:charles.duncan@aes.com)>

Subject: IPL site visit schedule

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**CAUTION:** This email originated from outside AES. Do not click links or open attachments unless you recognize the sender.

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All:

Here is the tentative schedule for this week's site visit.

Tuesday 2/28:

Meet at 8:00am at Eagle Valley(Halter)

Meet around 9:30/10:00am for Substations-location to be determined(Coppens or representative)

Meet around 1:00pm at Petersburg and substation(only tour)(Duncan)

Wednesday 3/1:

ENGINE VALVE COMBINED CYCLE 8:00 MARK HOLBROOK, ERIC GILBERT

2021 HMD JOINT FAILURES

2018 CONSTRUCTION

2021 GENERATOR ISSUES

FORWARD LINE AND HP TURBINES

DESK IN COMPLETION

EXPECT TO YES

1 STEAM TURBINE 2 GAS TURBINES

APRIL FIRST HOT GAS TEST INSULATION - 32,000 HOURS

LTJA AGREEMENT - 80% CAPITAL, 20% O + M

660 MW

2 v 1 BUT CAN RUN 1 v 1 OR JUST GAS UNITS

2 WATERTOWERS FROM OLD FACILITY

2022 - MAJOR WORKS / COMPLETION OF THE TURBINES

WATER TREATMENT - NO FLOW

VEGETATION IS GAS SUPPLY

BUILT 2 NEW WATERTOWERS

- CHEMICAL STORAGE / OIL WASTE

- PANTS AND EQUIPMENT

RANGE LOCATED

KNOWLEDGE CONTROLS

GE CONTROLS

CONDENSER AND 2 CONDENSATE PUMPS

PAC FOR BOTH UNITS

SHAKE WATER WITH JUMP

AIR COMPRESSORS AND DRYERS

Hydrology Council

Janet Lane for Water Treatment

Water Laboratory

2 GDU and Auxiliary Transformers

GIS Building

Major PDC, plus various other PDC for other projects

Council Water Pools and Plant Extensions

2 Vacuum Pools

H1, I1 + LP Steam Turbine (Toshiba)

3 Air compressors - Chemical > 2000

Control Pools Waterways

Council Tower - 10 cars

2 Core Pools and 2 Auxiliary Pools

Council Tower Chemical Halls

3 Water Tanks - Deaerated, Condensate + Hot/Boiler

Water Treatment Facility

- Softeners

- Reverse Osmosis

- Pumping Station

- Softener

- Salt Tanks

Diesel Generation

Auxiliary Hall

Administration Bldg

2 Boiler Feed Pumps

2 HRSBs and Strainers

For Gas Ventilation and Ammonia Tanks

New Generator for HRSB

Ammonia Tank

Campy Substation 15.50 Rodentia Corridor

2-138KV  $\Rightarrow$  13KV

2 Transformers

Built in 1980s/2000s

Microprocessor

Concrete Control Box

56 Breakers (Tie Breaker)

Communicated to Modco for Control Center

- Fiber Optic

Battery Bank + Charger

Microprocessor

Starting to be modern structures

5 pole Lost Starting Part of 138KV

TDISC will control line upgrade to 138KV

Green Valley Substation 15.45

1970s Construction

138KV  $\Rightarrow$  13KV

56 Tie Breaker

Control Box

2 Lines from Windmill Field

Plans to Upgrade Due to TDISC

Over electromagnetic lines

Battery Bank



Petersburg Generation Station 130 Charles Duncan

5400 - 138 KV Substation

Decontamination Facility

Emergency Relief Facility - 2017

Wastewater Treatment Facility - 2017

Gravel Pit

Agri Load Capped

Cooling Towers (3)

Concrete Storage Tank

Concrete Canisters (3)

Mercury Filter

Fluoride Equalization Tanks

Ammonia Tanks (2)

GSU - Added 2 Auxiliary Transformers

MATS Upgrade - 2017

Coal Handling

Unit 2 was low until 6/2023

Unit 1 retired

Unit 3+4 still operating

Recovery for w/MATS project

Plan to convert Unit 3+4 to gas - 2025

Engineering Package for

4 Turbines - 1+2 new low load

Day for ash system moved to Decontamination

Handing Street Construction Status 8:30 Green Eyes

UNITS 5, 6 & 7 CONJUGATED TO GTS

105 MW UNITS 5 & 6

450 MW UNIT 7

UNIT 1 & 2 FRAME 5 - 20 MW

UNIT 3 REMOVED

UNIT 4 & 5 GAS TURBINE 70 MW

UNIT 6 GAS TURBINE

UNITS 4 & 5 - 2016, UNIT 6 - 2017

UNIT 5, 6 & 7 - TURBINE VALUE OUTAGE, VALUE WORK

DCS UPGRADE UNIT 7

ARE FIRST MITIGATION WORK

CONJUGATED UNITS AT CONJUGATED FOR DCS

AUXILIARY POWER ADDED

NO LOWER TYPE LOAD

UNITS 5 & 6 - 2031, UNIT 7 - 2034

UNITS 1 & 2 GTS ARE BEING STAY - MAY EXCEED 4.5

STANDING MORE WORK FOR GTS

ARE DO C&I AND HOT GAS PATH - DONE BY JONES AND KROPP

TURBINE OVERHAUL UNIT 6 - 2023

UNIT 5 GTS TO BE REHALED - 2025

UNIT 7 JOURNAL TO BE REHALED - 2024

UNIT 7 GTS REHALED IN 2022 BUT WAS FAILED AND NOW BE CRASHED

STANDARD LOAD, SWITCHING WORK CONTINUAL

MUCH MORE CONSIDER CHANGING OF PARTS FOR GTS TO MINIMIZE OUTAGE LESS THAN 900

MAY HAVE TO REHALE TURBINE

GET STAYS ON POWER REO LINES

Gas turbine Plant

UNITS 1 + 4 online

Online UNITS 2 + 3

2022 - CTS on GT4

2019/2020 - UNIT 1 failure

Possible CTS installation if pressure usable

CIPING EQUIP following CTS

GT - NOX improvements

may require hardware to remove CTS

UNITS 1 + 2 can run on Fuel Oil

Expect 50% life

UNITS 4, 5 + 6 - North Yard 138KV

UNIT 7 - South Yard - 345KV

4 Water Box Condenser

UNIT 7 2 - Condensate Pumps

2 Boiler Feed Pumps - one is motor driven

New Soft Start unit for Boiler Feed Pumps

Electricity used during commissioning

Control Room for UNIT 7, includes GT UNITS 1 + 2

UNIT 7 Precipitation Return/Removal

UNIT 5 + 6 Precip Return to Plant

Control room Relocated in 2014

Auxiliary Boiler Room

- Boiler 1/2 units

3 Boiler Feed Pumps - UNIT 5 + 6 extra

UNIT 5 + 6 plus Gas Turbines in one Control Room

UNIT 5 Commissioning started during 2020 shutdown

UNIT 1 & 2 to be done in 2023

2 Circulators

Water Treatment w/low pressure pumps

3 Treatment - Chemicals

2 Backflow Tanks

Coarsers and Purifiers

Grandstand Gas Turbine Joints 11:50

4 Units - 2 on each

GE Frame 7EA

Generators

All units built <sup>with</sup> ~~in~~ <sup>with</sup> low voltage

Gas Joints

- 2 Backflow Tanks

- 2 Generators

Unit 1 - Frame unit U/used in 2019

Generator - open and commitment

Boiler/cooling system

Control Building - Low voltage Bus

138KV Switchgear  $\Rightarrow$  13.2KV

## INDIANAPOLIS POWER & LIGHT

Eagle Valley CCGT Station

February 28, 2023



ACCOUNT 312, BOILER PLANT EQUIPMENT  
CONDENSATE PUMP



ACCOUNT 345, ACCESSORY ELECTRIC EQUIPMENT  
PDC FOR GT UNIT 1



## INDIANAPOLIS POWER & LIGHT

Eagle Valley CCGT Station

February 28, 2023



ACCOUNT 344, GENERATORS  
GT UNIT 2



ACCOUNT 343, PRIME MOVERS  
WATER TREATMENT CONTROLS EQUIPMENT

## INDIANAPOLIS POWER & LIGHT

Eagle Valley CCGT Station

February 28, 2023



ACCOUNT 341, STRUCTURES AND IMPROVEMENTS  
WATER TESTING LABORATORY



ACCOUNT 345, ACCESSORY ELECTRIC EQUIPMENT  
GT UNIT 2 GSU TRANSFORMER



## INDIANAPOLIS POWER & LIGHT

Eagle Valley CCGT Station

February 28, 2023



ACCOUNT 341, STRUCTURES AND IMPROVEMENTS  
GIS BUILDING



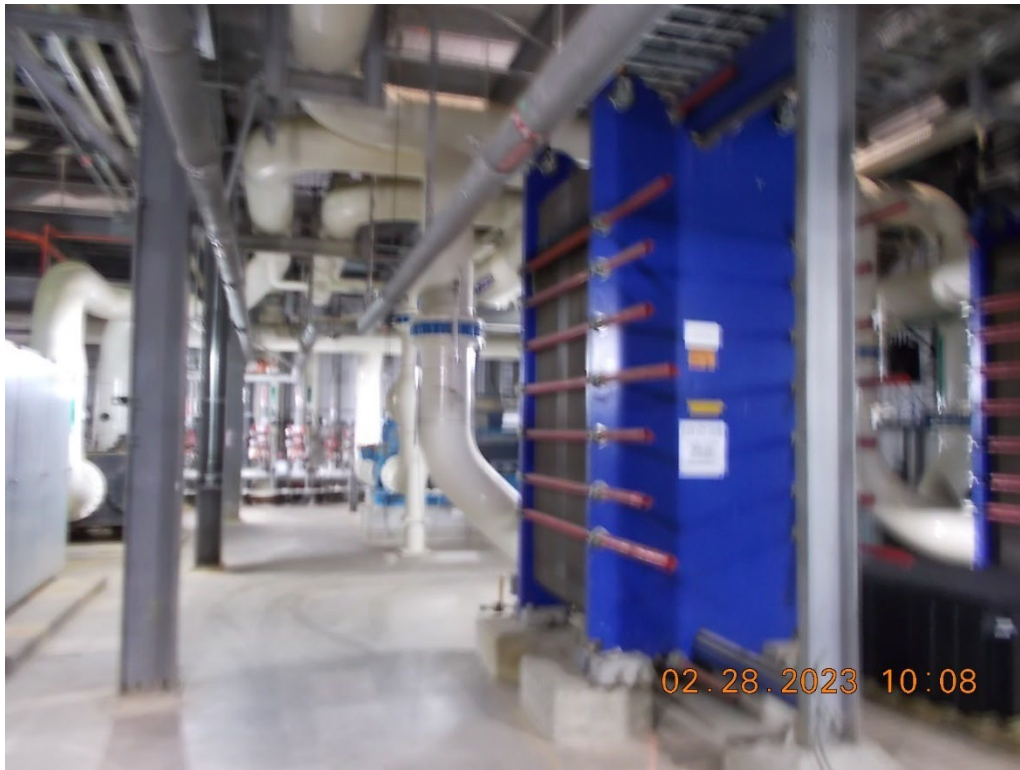
ACCOUNT 345, ACCESSORY ELECTRIC EQUIPMENT  
PDC (ACCESSORY EQUIPMENT AND BREAKERS) FOR THE STATION



## INDIANAPOLIS POWER & LIGHT

Eagle Valley CCGT Station

February 28, 2023



ACCOUNT 312, BOILER PLANT EQUIPMENT  
COOLING WATER PUMPS/HEAT EXCHANGERS



ACCOUNT 314, TURBOGENERATOR UNITS  
STEAM TURBINE (INTERIOR)

## INDIANAPOLIS POWER & LIGHT

Eagle Valley CCGT Station

February 28, 2023



ACCOUNT 314, TURBOGENERATOR UNITS  
STEAM TURBINE (EXTERIOR)



ACCOUNT 315, ACCESSORY ELECTRIC EQUIPMENT  
STEAM UNIT GSU TRANSFORMER



## INDIANAPOLIS POWER & LIGHT

Eagle Valley CCGT Station

February 28, 2023



ACCOUNT 343, PRIME MOVERS  
COOLING TOWERS



ACCOUNT 341, STRUCTURES AND IMPROVEMENTS  
EQUIPMENT AND PARTS WAREHOUSES

## INDIANAPOLIS POWER & LIGHT

Eagle Valley CCGT Station

February 28, 2023



ACCOUNT 343, PRIME MOVERS  
COOLING TOWERS



ACCOUNT 343, PRIME MOVERS  
CHEMICAL STORAGE FOR WATER TREATMENT



## INDIANAPOLIS POWER & LIGHT

Eagle Valley CCGT Station

February 28, 2023



ACCOUNT 343, PRIME MOVERS  
WATER STORAGE TANKS



ACCOUNT 343, PRIME MOVERS  
RO WATER TREATMENT SYSTEM

## INDIANAPOLIS POWER & LIGHT

Eagle Valley CCGT Station

February 28, 2023



ACCOUNT 311, STRUCTURES AND IMPROVEMENTS  
STOREROOM AND WAREHOUSE



ACCOUNT 344, GENERATORS  
BACKUP DIESEL GENERATOR



## INDIANAPOLIS POWER & LIGHT

Eagle Valley CCGT Station

February 28, 2023



ACCOUNT 344, GENERATORS  
HRSG



ACCOUNT 312, BOILER PLANT EQUIPMENT  
AUXILIARY BOILER

## INDIANAPOLIS POWER & LIGHT

Eagle Valley CCGT Station

February 28, 2023



ACCOUNT 312, BOILER PLANT EQUIPMENT  
BOILER FEED PUMPS



ACCOUNT 344, GENERATORS  
AMMONIA VAPORIZOR SKID



## INDIANAPOLIS POWER & LIGHT

Eagle Valley CCGT Station

February 28, 2023



ACCOUNT 344, GENERATORS  
AMMONIA STORAGE TANK

## INDIANAPOLIS POWER & LIGHT

Camby Substation

February 28, 2023



ACCOUNT 361, STRUCTURES AND IMPROVEMENTS  
MODULAR CONTROL BUILDING



ACCOUNT 362, STATION EQUIPMENT  
TRANSFORMER AND BREAKERS



## INDIANAPOLIS POWER & LIGHT

Camby Substation

February 28, 2023



ACCOUNT 362, STATION EQUIPMENT  
SF6 GAS BREAKER



ACCOUNT 362, STATION EQUIPMENT  
MICROPROCESSOR CONTROLS

## INDIANAPOLIS POWER & LIGHT

Camby Substation

February 28, 2023



ACCOUNT 362, STATION EQUIPMENT  
BATTERY BANK



## INDIANAPOLIS POWER & LIGHT

Glenns Valley Substation

February 28, 2023



ACCOUNT 361, STRUCTURES AND IMPROVEMENTS  
CONTROL BUILDING



ACCOUNT 362, STATION EQUIPMENT  
TRANSFORMER AND BREAKERS

## INDIANAPOLIS POWER & LIGHT

Glenns Valley Substation

February 28, 2023



ACCOUNT 362, STATION EQUIPMENT  
MICROPROCESSOR CONTROLS



ACCOUNT 362, STATION EQUIPMENT  
ELECTROMECHANICAL RELAYS



## INDIANAPOLIS POWER & LIGHT

Glenns Valley Substation

February 28, 2023



ACCOUNT 362, STATION EQUIPMENT  
BATTERY BANK

## INDIANAPOLIS POWER & LIGHT

Petersburg Station

February 28, 2023



ACCOUNT 311, STRUCTURES AND IMPROVEMENTS  
WASTEWATER TREATMENT FACILITY BUILDING



ACCOUNT 311, STRUCTURES AND IMPROVEMENTS  
SUBMERGED FLIGHT CONVEYOR (ASH PROCESSING) BUILDING



## INDIANAPOLIS POWER & LIGHT

Petersburg Station

February 28, 2023



ACCOUNT 315, ACCESSORY ELECTRIC EQUIPMENT  
UNIT 4 GSU TRANSFORMER



ACCOUNT 312, BOILER PLANT EQUIPMENT  
UNIT 2 BAGHOUSE

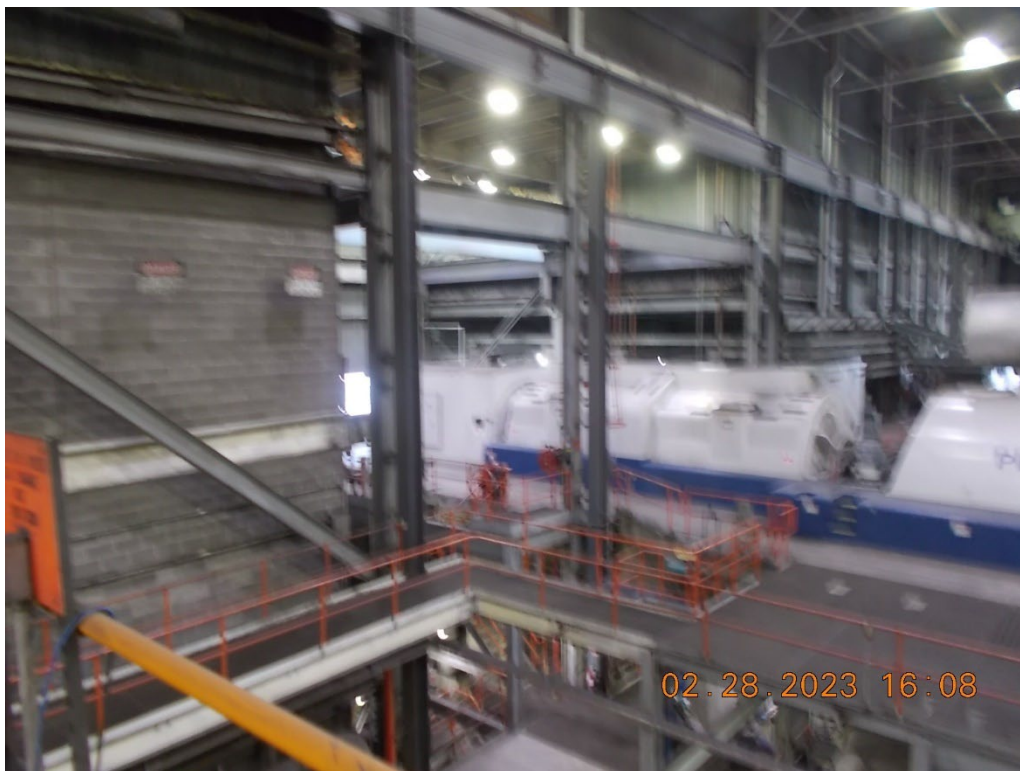
## INDIANAPOLIS POWER & LIGHT

Petersburg Station

February 28, 2023



ACCOUNT 314, TURBOGENERATOR UNITS  
UNITS 3 AND 4



ACCOUNT 314, TURBOGENERATOR UNITS  
UNIT 2



## INDIANAPOLIS POWER & LIGHT

Petersburg Station

February 28, 2023



ACCOUNT 312, BOILER PLANT EQUIPMENT  
COOLING TOWERS / WASTEWATER TREATMENT / ASH PROCESSING



ACCOUNT 312, BOILER PLANT EQUIPMENT  
SCRUBBER

## INDIANAPOLIS POWER & LIGHT

Harding Street Station

February 28, 2023



ACCOUNT 311, STRUCTURES AND IMPROVEMENTS  
ADMINISTRATION BUILDING



ACCOUNT 311, STRUCTURES AND IMPROVEMENTS  
UNIT 7 STRUCTURE



## INDIANAPOLIS POWER & LIGHT

Harding Street Station

February 28, 2023



ACCOUNT 311, STRUCTURES AND IMPROVEMENTS  
UNIT 5 AND 6 STRUCTURE



ACCOUNT 353, STATION EQUIPMENT  
UNITS 5 AND 6 SUBSTATION / SWITCHYARD

## INDIANAPOLIS POWER & LIGHT

Harding Street Station

February 28, 2023



ACCOUNT 312, BOILER PLANT EQUIPMENT  
UNIT 7 CONDENSING UNITS



ACCOUNT 312, BOILER PLANT EQUIPMENT  
UNIT 7 CIRCULATING PUMPS



## INDIANAPOLIS POWER & LIGHT

Harding Street Station

February 28, 2023



ACCOUNT 312, BOILER PLANT EQUIPMENT  
BOILER FEED PUMP



ACCOUNT 315, ACCESSORY ELECTRIC EQUIPMENT  
UNIT 7 CONTROLS

## INDIANAPOLIS POWER & LIGHT

Harding Street Station

February 28, 2023



ACCOUNT 314, TURBOGENERATOR UNITS  
UNIT 7 TURBINE



ACCOUNT 315, ACCESSORY ELECTRIC EQUIPMENT  
CONTROL ROOM



## INDIANAPOLIS POWER & LIGHT

Harding Street Station

February 28, 2023



ACCOUNT 344, GENERATORS  
GT UNITS 4, 5 AND 6



ACCOUNT 312, BOILER PLANT EQUIPMENT  
STEAM UNIT 7 COOLING TOWERS

## INDIANAPOLIS POWER & LIGHT

Harding Street Station

February 28, 2023



ACCOUNT 312, BOILER PLANT EQUIPMENT  
STEAM UNIT 7 FDR DUCTWORK FOR COOLING FANS



ACCOUNT 311, STRUCTURES AND IMPROVEMENTS  
AUXILIARY BOILER BUILDING



## INDIANAPOLIS POWER & LIGHT

Harding Street Station

February 28, 2023



ACCOUNT 312, BOILER PLANT EQUIPMENT  
AUXILIARY BOILER



ACCOUNT 314, TURBOGENERATOR UNITS  
STEAM UNIT 6

## INDIANAPOLIS POWER & LIGHT

Harding Street Station

February 28, 2023



ACCOUNT 315, ACCESSORY ELECTRIC EQUIPMENT  
STEAM UNITS 5 AND 6 CONTROL ROOM



ACCOUNT 314, TURBOGENERATOR UNITS  
STEAM UNIT 5



## INDIANAPOLIS POWER & LIGHT

Harding Street Station

February 28, 2023



ACCOUNT 311, STRUCTURES AND IMPROVEMENTS  
TRAVELING SCREENS STRUCTURE



ACCOUNT 312, BOILER PLANT EQUIPMENT  
STEAM UNIT 6 COOLING TOWERS

## INDIANAPOLIS POWER & LIGHT

Harding Street Station

February 28, 2023



ACCOUNT 353, STATION EQUIPMENT  
STEAM UNIT 7 345KV AND 138 KV SUBSTATION / SWITCHYARD



ACCOUNT 312, BOILER PLANT EQUIPMENT  
STEAM WASTEWATER TREATMENT EQUIPMENT



## INDIANAPOLIS POWER & LIGHT

Harding Street Station

February 28, 2023



ACCOUNT 344, GENERATORS  
GT UNITS 4 AND 5



ACCOUNT 344, GENERATORS  
GT UNIT 6

## INDIANAPOLIS POWER & LIGHT

Harding Street Station

February 28, 2023



ACCOUNT 344, GENERATORS  
GT UNIT 5



ACCOUNT 344, GENERATORS  
GT UNIT 4 (INTERIOR)



## INDIANAPOLIS POWER & LIGHT

Harding Street Station

February 28, 2023



ACCOUNT 344, GENERATORS  
CT UNITS

## INDIANAPOLIS POWER & LIGHT

Georgetown Station

February 28, 2023



ACCOUNT 344, GENERATORS  
GT UNIT 1



ACCOUNT 341, STRUCTURES AND IMPROVEMENTS  
WAREHOUSE / GARAGE BUILDING



## INDIANAPOLIS POWER & LIGHT

Georgetown Station

February 28, 2023



ACCOUNT 341, STRUCTURES AND IMPROVEMENTS  
BLOCK CONTROL BUILDING



ACCOUNT 344, GENERATORS  
GT UNIT 1 STARTER

## INDIANAPOLIS POWER & LIGHT

Georgetown Station

February 28, 2023



ACCOUNT 344, GENERATORS  
GT UNIT 1 GENERATOR



ACCOUNT 344, GENERATORS  
GT UNIT 4 AIR INTAKE



## INDIANAPOLIS POWER & LIGHT

Georgetown Station

February 28, 2023



ACCOUNT 344, GENERATORS  
GT UNIT 4



ACCOUNT 345, ACCESSORY ELECTRIC EQUIPMENT  
GT UNIT 1 GSU

## INDIANAPOLIS POWER & LIGHT

Georgetown Station

February 28, 2023



ACCOUNT 353, STATION EQUIPMENT  
138 KV SUBSTATION

**Data Request OUCC DR 26 - 10**

If not provided in the workpapers, please provide the retirement rate analysis ranking of best-fit life/curve combinations for each account.

**Objection:**

**Response:**

Please see OUCC DR 26-10 Attachment 1 for the best-fit life/curve combinations for each studied account.

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNTS 311.00 AND 311.02 STRUCTURES AND IMPROVEMENTS

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1932-2024      001      EXPERIENCE BAND 1994-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
155.1-S0	1.65	0 - 78			
132.7-S0.5	2.03	0 - 78			NOT FITTED
115.1-S1	2.89	0 - 78			NOT FITTED
104.4-S1.5	3.46	0 - 78			NOT FITTED
200.2-R0.5	1.81	0 - 78			NOT FITTED
180.6-R1	1.28	0 - 78			NOT FITTED
145.4-R1.5	1.23	0 - 78			NOT FITTED
118.6-R2	1.55	0 - 78			NOT FITTED
103.4-R2.5	2.17	0 - 78			NOT FITTED
200.2-L0	2.17	0 - 78			NOT FITTED
183.8-L0.5	1.45	0 - 78			NOT FITTED
150.2-L1	2.06	0 - 78			NOT FITTED
129.5-L1.5	2.48	0 - 78			NOT FITTED
200.2-O1	3.64	0 - 78			NOT FITTED
200.2-O2	4.95	0 - 78			NOT FITTED
200.2-O3	10.28	0 - 78			NOT FITTED
200.2-O4	15.72	0 - 78			NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING



INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNTS 312.00 AND 312.02 BOILER PLANT EQUIPMENT

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1932-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
62.7-S0	4.76	0 - 55		65.7-S0	4.92	24 - 55
58.1-S0.5	6.29	0 - 55		61.4-S0.5	6.30	24 - 55
54.7-S1	8.12	0 - 55		58.1-S1	7.97	24 - 55
52.3-S1.5	9.78	0 - 55		55.5-S1.5	9.68	24 - 55
72.0-R0.5	2.37	0 - 55		71.7-R0.5	2.85	24 - 55
62.4-R1	3.51	0 - 55		63.4-R1	4.10	24 - 55
56.8-R1.5	5.11	0 - 55		58.5-R1.5	5.67	24 - 55
52.8-R2	7.27	0 - 55		55.1-R2	7.59	24 - 55
80.7-L0	3.00	0 - 55		83.0-L0	3.34	24 - 55
71.9-L0.5	4.25	0 - 55		74.9-L0.5	4.53	24 - 55
65.2-L1	5.87	0 - 55		69.0-L1	5.91	24 - 55
60.2-L1.5	7.52	0 - 55		63.8-L1.5	7.58	24 - 55
84.6-O1	1.90	0 - 55		82.9-O1	2.15	24 - 55
95.1-O2	1.90	0 - 55			NOT FITTED	
136.2-O3	1.78	0 - 55			NOT FITTED	
182.8-O4	1.73	0 - 55			NOT FITTED	

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNTS 312.30 AND 312.32 ASH AND COAL HANDLING EQUIPMENT

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1932-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
58.7-S0	4.01	0 - 67		59.4-S0	4.74	25 - 67
56.4-S0.5	5.77	0 - 67		57.7-S0.5	6.45	25 - 67
54.6-S1	7.84	0 - 67		56.3-S1	8.43	25 - 67
53.4-S1.5	9.94	0 - 67		55.2-S1.5	10.72	25 - 67
62.3-R0.5	3.08	0 - 67		60.6-R0.5	3.43	25 - 67
57.5-R1	3.87	0 - 67		57.1-R1	4.93	25 - 67
55.0-R1.5	5.82	0 - 67		55.4-R1.5	7.09	25 - 67
53.2-R2	8.31	0 - 67		54.2-R2	9.55	25 - 67
70.6-L0	2.63	0 - 67		69.8-L0	3.11	25 - 67
65.6-L0.5	3.14	0 - 67		66.0-L0.5	3.81	25 - 67
61.6-L1	4.50	0 - 67		63.1-L1	4.96	25 - 67
58.9-L1.5	6.54	0 - 67		60.7-L1.5	7.16	25 - 67
69.1-O1	3.52	0 - 67		65.7-O1	3.14	25 - 67
77.7-O2	3.51	0 - 67		73.9-O2	3.14	25 - 67
108.1-O3	3.96	0 - 67		101.2-O3	3.43	25 - 67
142.8-O4	4.22	0 - 67				NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 312.40 RAILROAD TRACK SYSTEM/CARS

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1989-2020      001      EXPERIENCE BAND 2008-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
16.1-S0	21.04	0 - 14			
14.9-S0.5	19.77	0 - 14			NOT FITTED
14.0-S1	18.31	0 - 14			NOT FITTED
13.4-S1.5	16.90	0 - 14			NOT FITTED
12.9-S2	15.33	0 - 14			NOT FITTED
12.6-S2.5	13.87	0 - 14			NOT FITTED
12.3-S3	12.25	0 - 14			NOT FITTED
11.9-S4	8.49	0 - 14			NOT FITTED
11.8-S5	6.34	0 - 14			NOT FITTED
11.8-S6	8.06	0 - 14			NOT FITTED
18.5-R0.5	23.21	0 - 14			NOT FITTED
16.0-R1	22.02	0 - 14			NOT FITTED
14.6-R1.5	20.59	0 - 14			NOT FITTED
13.5-R2	18.63	0 - 14			NOT FITTED
12.9-R2.5	16.76	0 - 14			NOT FITTED
12.4-R3	14.47	0 - 14			NOT FITTED
11.9-R4	10.29	0 - 14			NOT FITTED
11.8-R5	6.69	0 - 14			NOT FITTED
20.7-L0	22.52	0 - 14			NOT FITTED
18.4-L0.5	21.45	0 - 14			NOT FITTED
16.7-L1	20.25	0 - 14			NOT FITTED
15.4-L1.5	18.81	0 - 14			NOT FITTED
14.4-L2	17.08	0 - 14			NOT FITTED
13.7-L2.5	15.57	0 - 14			NOT FITTED
13.1-L3	13.76	0 - 14			NOT FITTED
12.3-L4	10.24	0 - 14			NOT FITTED
11.9-L5	7.36	0 - 14			NOT FITTED
21.8-O1	23.85	0 - 14			NOT FITTED
24.5-O2	23.85	0 - 14			NOT FITTED
35.1-O3	24.06	0 - 14			NOT FITTED
47.1-O4	24.17	0 - 14			NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 314.00 TURBOGENERATOR UNITS

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1932-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
69.2-S0	3.40	0 - 68		70.3-S0	4.09	28 - 68
65.2-S0.5	4.59	0 - 68		67.0-S0.5	5.02	28 - 68
62.1-S1	6.33	0 - 68		64.5-S1	6.44	28 - 68
60.0-S1.5	8.02	0 - 68		62.4-S1.5	8.15	28 - 68
76.4-R0.5	3.17	0 - 68		73.8-R0.5	3.57	28 - 68
68.2-R1	2.85	0 - 68		67.4-R1	3.61	28 - 68
63.5-R1.5	3.71	0 - 68		63.9-R1.5	4.56	28 - 68
60.1-R2	5.68	0 - 68		61.4-R2	6.31	28 - 68
86.6-L0	2.97	0 - 68			NOT FITTED	
78.6-L0.5	3.19	0 - 68			NOT FITTED	
72.4-L1	4.24	0 - 68		74.5-L1	4.72	28 - 68
67.9-L1.5	5.72	0 - 68		70.3-L1.5	6.06	28 - 68
87.8-O1	3.80	0 - 68			NOT FITTED	
98.7-O2	3.79	0 - 68			NOT FITTED	
140.1-O3	4.08	0 - 68			NOT FITTED	
186.9-O4	4.23	0 - 68			NOT FITTED	

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNTS 315.00 AND 315.02 ACCESSORY ELECTRIC EQUIPMENT

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1932-2024      001      EXPERIENCE BAND 1994-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
115.0-S0	1.34	0 - 64			NOT FITTED
99.8-S0.5	2.04	0 - 64			NOT FITTED
88.0-S1	3.21	0 - 64			NOT FITTED
80.6-S1.5	4.05	0 - 64			NOT FITTED
163.5-R0.5	0.99	0 - 64			NOT FITTED
128.6-R1	0.82	0 - 64			NOT FITTED
105.7-R1.5	0.91	0 - 64			NOT FITTED
88.7-R2	1.74	0 - 64			NOT FITTED
164.5-L0	0.70	0 - 64			NOT FITTED
135.3-L0.5	1.11	0 - 64			NOT FITTED
113.1-L1	2.14	0 - 64			NOT FITTED
98.6-L1.5	2.84	0 - 64			NOT FITTED
200.2-O1	1.04	0 - 64			NOT FITTED
200.2-O2	1.30	0 - 64			NOT FITTED
200.2-O3	5.52	0 - 64			NOT FITTED
200.2-O4	10.24	0 - 64			NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNTS 316.00 AND 316.02 MISCELLANEOUS POWER PLANT EQUIPMENT

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1932-2024      001      EXPERIENCE BAND 1994-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
66.8-S0	1.29	0 - 52			
60.9-S0.5	2.25	0 - 52			NOT FITTED
56.4-S1	3.79	0 - 52			NOT FITTED
53.3-S1.5	5.22	0 - 52			NOT FITTED
80.5-R0.5	2.47	0 - 52			NOT FITTED
67.8-R1	1.79	0 - 52			NOT FITTED
60.1-R1.5	1.64	0 - 52			NOT FITTED
54.6-R2	2.87	0 - 52			NOT FITTED
51.2-R2.5	4.63	0 - 52			NOT FITTED
88.5-L0	1.43	0 - 52			NOT FITTED
77.2-L0.5	1.15	0 - 52			NOT FITTED
68.7-L1	2.06	0 - 52			NOT FITTED
62.4-L1.5	3.35	0 - 52			NOT FITTED
96.4-O1	2.87	0 - 52			NOT FITTED
108.3-O2	2.86	0 - 52			NOT FITTED
156.4-O3	2.99	0 - 52			NOT FITTED
200.2-O4	2.85	0 - 52			NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 344.10 GENERATORS - WIND

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 2009-2009      001      EXPERIENCE BAND 2009-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
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NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 341.00 STRUCTURES AND IMPROVEMENTS

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1994-2024      001      EXPERIENCE BAND 1994-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
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NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING



INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 342.00 FUEL HOLDERS, PRODUCERS AND ACCESSORIES - HANDLING AND STORAGE

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1994-2021      001      EXPERIENCE BAND 1996-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
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NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 343.00 PRIME MOVERS

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1994-2022      001      EXPERIENCE BAND 1996-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
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NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 344.00 GENERATORS

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1967-2024      001      EXPERIENCE BAND 1994-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
60.0-S0	5.76	0 - 52			
55.6-S0.5	4.88	0 - 52			NOT FITTED
52.2-S1	4.28	0 - 52			NOT FITTED
49.8-S1.5	4.28	0 - 52			NOT FITTED
48.0-S2	5.02	0 - 52			NOT FITTED
69.3-R0.5	7.93	0 - 52			NOT FITTED
59.9-R1	6.85	0 - 52			NOT FITTED
54.4-R1.5	5.64	0 - 52			NOT FITTED
50.4-R2	4.48	0 - 52			NOT FITTED
48.0-R2.5	4.30	0 - 52			NOT FITTED
46.2-R3	5.32	0 - 52			NOT FITTED
44.5-R4	9.06	0 - 52			NOT FITTED
77.6-L0	7.10	0 - 52			NOT FITTED
68.9-L0.5	6.12	0 - 52			NOT FITTED
62.4-L1	5.13	0 - 52			NOT FITTED
57.5-L1.5	4.36	0 - 52			NOT FITTED
53.8-L2	4.24	0 - 52			NOT FITTED
51.1-L2.5	4.69	0 - 52			NOT FITTED
48.9-L3	5.97	0 - 52			NOT FITTED
81.6-O1	8.53	0 - 52			NOT FITTED
91.7-O2	8.52	0 - 52			NOT FITTED
131.5-O3	8.72	0 - 52			NOT FITTED
176.5-O4	8.83	0 - 52			NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 345.00 ACCESSORY ELECTRIC EQUIPMENT

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1994-2024      001      EXPERIENCE BAND 1996-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
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NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 346.00 MISCELLANEOUS POWER PLANT EQUIPMENT

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1994-2023      001      EXPERIENCE BAND 1996-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
-------------------	---------------	-----------------	-------------------	---------------	------------------

NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 350.50 LAND RIGHTS

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1921-2019      001      EXPERIENCE BAND 1994-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
-------------------	---------------	-----------------	-------------------	---------------	------------------

NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 351.00 ENERGY STORAGE EQUIPMENT

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 2016-2016      001      EXPERIENCE BAND 2016-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
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NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 352.00 STRUCTURES AND IMPROVEMENTS

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1914-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
151.5-S0	1.02	0 - 59			NOT FITTED	
125.1-S0.5	1.35	0 - 59			NOT FITTED	
103.7-S1	2.10	0 - 59			NOT FITTED	
91.9-S1.5	2.51	0 - 59			NOT FITTED	
200.2-R0.5	1.66	0 - 59			NOT FITTED	
198.2-R1	0.45	0 - 59			NOT FITTED	
152.4-R1.5	0.49	0 - 59			NOT FITTED	
115.3-R2	0.83	0 - 59			NOT FITTED	
200.2-L0	1.57	0 - 59			NOT FITTED	
183.6-L0.5	0.76	0 - 59			NOT FITTED	
141.1-L1	1.35	0 - 59			NOT FITTED	
118.3-L1.5	1.68	0 - 59			NOT FITTED	
200.2-O1	3.37	0 - 59			NOT FITTED	
200.2-O2	4.42	0 - 59			NOT FITTED	
200.2-O3	8.66	0 - 59			NOT FITTED	
200.2-O4	13.13	0 - 59			NOT FITTED	

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING



INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNTS 353.00 STATION EQUIPMENT

INPUT CONTROL TOTALS THROUGH 2024

TRAN CODE	----- T O T A L I N P U T D A T A ----- AGEDUNAGEDTOTAL		
0	41,277,641.86-	0.00	41,277,641.86-
3	8,409,097.66-	0.00	8,409,097.66-
9	322,917,453.81	0.00	322,917,453.81
TOTAL DATA	273,230,714.29	0.00	273,230,714.29
8	273,230,714.29	0.00	273,230,714.29

## ORIGINAL LIFE TABLE

EXPERIENCE ANALYSIS  
EXPERIENCE BAND 1994-2024

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	228,021,917	10,575	0.0000	1.0000	100.00
0.5	203,385,590	11,375	0.0001	0.9999	100.00
1.5	202,816,748	26,780	0.0001	0.9999	99.99
2.5	184,355,604	86,802	0.0005	0.9995	99.98
3.5	161,045,362	86,720	0.0005	0.9995	99.93
4.5	158,286,587	480,225	0.0030	0.9970	99.88
5.5	156,387,813	909,713	0.0058	0.9942	99.57
6.5	164,399,740	2,134,348	0.0130	0.9870	98.99
7.5	154,937,714	383,462	0.0025	0.9975	97.71
8.5	120,860,064	149,544	0.0012	0.9988	97.47
9.5	102,914,093	429,825	0.0042	0.9958	97.35
10.5	97,187,754	222,413	0.0023	0.9977	96.94
11.5	93,561,135	702,302	0.0075	0.9925	96.72
12.5	82,221,510	351,518	0.0043	0.9957	95.99
13.5	80,825,898	139,146	0.0017	0.9983	95.58
14.5	78,509,141	2,780,705	0.0354	0.9646	95.42
15.5	76,414,925	301,274	0.0039	0.9961	92.04
16.5	80,141,818	334,439	0.0042	0.9958	91.67
17.5	81,892,179	1,229,343	0.0150	0.9850	91.29
18.5	80,784,679	399,107	0.0049	0.9951	89.92
19.5	87,525,343	2,459,812	0.0281	0.9719	89.48
20.5	88,237,728	7,353,938	0.0833	0.9167	86.96
21.5	80,985,588	655,999	0.0081	0.9919	79.71
22.5	80,007,236	640,054	0.0080	0.9920	79.07
23.5	74,917,509	330,029	0.0044	0.9956	78.44
24.5	73,272,816	1,840,661	0.0251	0.9749	78.09
25.5	66,703,021	902,636	0.0135	0.9865	76.13
26.5	64,813,221	481,503	0.0074	0.9926	75.10
27.5	61,747,797	193,699	0.0031	0.9969	74.54
28.5	61,595,576	1,283,681	0.0208	0.9792	74.31
29.5	58,170,248	526,513	0.0091	0.9909	72.76
30.5	57,097,010	276,583	0.0048	0.9952	72.10
31.5	54,510,808	439,101	0.0081	0.9919	71.75
32.5	52,053,506	687,026	0.0132	0.9868	71.17
33.5	50,378,306	707,457	0.0140	0.9860	70.23
34.5	46,710,362	282,243	0.0060	0.9940	69.25
35.5	46,587,749	241,215	0.0052	0.9948	68.83
36.5	44,765,651	312,752	0.0070	0.9930	68.47
37.5	42,517,219	894,890	0.0210	0.9790	67.99
38.5	38,138,470	598,500	0.0157	0.9843	66.56

## ORIGINAL LIFE TABLE, CONT.

EXPERIENCE ANALYSIS  
EXPERIENCE BAND 1994-2024

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	34,943,545	100,389	0.0029	0.9971	65.52
40.5	35,154,048	181,412	0.0052	0.9948	65.33
41.5	34,094,674	121,434	0.0036	0.9964	64.99
42.5	32,378,557	728,189	0.0225	0.9775	64.76
43.5	31,390,734	159,424	0.0051	0.9949	63.30
44.5	31,066,706	1,035,504	0.0333	0.9667	62.98
45.5	29,688,196	910,945	0.0307	0.9693	60.88
46.5	28,489,875	112,317	0.0039	0.9961	59.02
47.5	26,235,564	512,558	0.0195	0.9805	58.78
48.5	23,651,215	710,785	0.0301	0.9699	57.63
49.5	21,397,619	169,393	0.0079	0.9921	55.90
50.5	20,748,532	123,756	0.0060	0.9940	55.46
51.5	17,856,678	172,959	0.0097	0.9903	55.13
52.5	16,809,788	56,096	0.0033	0.9967	54.60
53.5	14,547,034	33,052	0.0023	0.9977	54.41
54.5	13,497,466	96,221	0.0071	0.9929	54.29
55.5	10,736,520	379,559	0.0354	0.9646	53.90
56.5	8,202,415	57,497	0.0070	0.9930	52.00
57.5	7,065,936	68,722	0.0097	0.9903	51.63
58.5	6,587,889	24,995	0.0038	0.9962	51.13
59.5	6,838,760	465,808	0.0681	0.9319	50.94
60.5	5,998,521	30,016	0.0050	0.9950	47.47
61.5	5,364,304	89,709	0.0167	0.9833	47.23
62.5	5,024,709	686,836	0.1367	0.8633	46.44
63.5	4,186,829	543,969	0.1299	0.8701	40.09
64.5	3,536,881	460,145	0.1301	0.8699	34.88
65.5	3,005,579	296,433	0.0986	0.9014	30.34
66.5	1,987,808	22,627	0.0114	0.9886	27.35
67.5	1,923,348	237,519	0.1235	0.8765	27.04
68.5	1,354,143	28,559	0.0211	0.9789	23.70
69.5	1,282,536	102,705	0.0801	0.9199	23.20
70.5	1,229,876	166,267	0.1352	0.8648	21.34
71.5	507,898		0.0000	1.0000	18.46
72.5	195,381	30,166	0.1544	0.8456	18.46
73.5	119,147		0.0000	1.0000	15.61
74.5	119,082	769	0.0065	0.9935	15.61
75.5	90,323	8,356	0.0925	0.9075	15.51
76.5	81,967	840	0.0102	0.9898	14.07
77.5	81,113		0.0000	1.0000	13.93
78.5	81,113	510	0.0063	0.9937	13.93

## ORIGINAL LIFE TABLE, CONT.

EXPERIENCE ANALYSIS  
EXPERIENCE BAND 1994-2024

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	80,316	14	0.0002	0.9998	13.84
80.5	80,315	1,717	0.0214	0.9786	13.84
81.5	78,591	1,405	0.0179	0.9821	13.54
82.5	77,486	410	0.0053	0.9947	13.30
83.5	77,075	67,363	0.8740	0.1260	13.23
84.5	4,040	2,366	0.5856	0.4144	1.67
85.5	1,674		0.0000	1.0000	0.69
86.5	19		0.0000	1.0000	0.69
87.5	19		0.0000	1.0000	0.69
88.5	19	7	0.3486	0.6514	0.69
89.5	12		0.0000	1.0000	0.45
90.5	12		0.0000	1.0000	0.45
91.5	12		0.0000	1.0000	0.45
92.5	12		0.0000	1.0000	0.45
93.5	12		0.0000	1.0000	0.45
94.5	12		0.0000	1.0000	0.45
95.5	12	12	0.9779	0.0221	0.45
96.5	0		0.0000	1.0000	0.01
97.5	0		0.0000	1.0000	0.01
98.5	0		0.0000	1.0000	0.01
99.5	0		0.0000	1.0000	0.01
100.5	0		0.0000	1.0000	0.01
101.5	0		0.0000	1.0000	0.01
102.5	0		0.0000	1.0000	0.01
103.5	0		0.0000	1.0000	0.01
104.5	0		0.0000	1.0000	0.01
105.5	0		0.0000	1.0000	0.01
106.5	0	0	1.0000		0.01
107.5					
TOTAL	4,307,637,382	41,277,643			

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNTS 353.00 STATION EQUIPMENT

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1914-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
52.9-S0	4.42	0 - 67		52.7-S0	5.36	21 - 67
51.5-S0.5	6.22	0 - 67		51.8-S0.5	7.30	21 - 67
50.3-S1	8.37	0 - 67		51.0-S1	9.50	21 - 67
49.6-S1.5	10.55	0 - 67		50.4-S1.5	11.91	21 - 67
55.0-R0.5	3.61	0 - 67		53.2-R0.5	3.47	21 - 67
51.9-R1	4.43	0 - 67		51.1-R1	5.40	21 - 67
50.4-R1.5	6.55	0 - 67		50.2-R1.5	7.98	21 - 67
49.3-R2	9.16	0 - 67		49.6-R2	10.74	21 - 67
61.9-L0	3.39	0 - 67		60.3-L0	3.59	21 - 67
58.4-L0.5	3.68	0 - 67		57.8-L0.5	4.43	21 - 67
55.5-L1	4.88	0 - 67		55.8-L1	5.77	21 - 67
53.7-L1.5	6.94	0 - 67		54.3-L1.5	8.02	21 - 67
59.5-O1	4.37	0 - 67		56.3-O1	3.28	21 - 67
66.9-O2	4.38	0 - 67		63.2-O2	3.31	21 - 67
91.2-O3	5.20	0 - 67		84.6-O3	4.20	21 - 67
119.2-O4	5.64	0 - 67		109.3-O4	4.71	21 - 67

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 354.00 TOWERS AND FIXTURES

INPUT CONTROL TOTALS THROUGH 2024

TRAN CODE	----- T O T A L I N P U T D A T A ----- AGED UNAGED TOTAL
0	1,562,647.82- 0.00 1,562,647.82-
3	499,024.61 0.00 499,024.61
9	54,956,660.23 0.00 54,956,660.23
TOTAL DATA	53,893,037.02 0.00 53,893,037.02
8	53,893,037.02 0.00 53,893,037.02



INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 354.00 TOWERS AND FIXTURES

ORIGINAL LIFE TABLE

AVG AGE RET 36.5 001 EXPERIENCE ANALYSIS  
PLACEMENT BAND 1932-2023 EXPERIENCE BAND 1994-2024

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	15,046,695	79	0.0000	1.0000	100.00
0.5	15,331,563		0.0000	1.0000	100.00
1.5	12,641,124	1,399	0.0001	0.9999	100.00
2.5	12,851,992		0.0000	1.0000	99.99
3.5	12,830,037		0.0000	1.0000	99.99
4.5	9,637,542	84,874	0.0088	0.9912	99.99
5.5	10,085,900		0.0000	1.0000	99.11
6.5	10,177,924		0.0000	1.0000	99.11
7.5	17,765,799		0.0000	1.0000	99.11
8.5	18,444,485	16,656	0.0009	0.9991	99.11
9.5	15,697,773		0.0000	1.0000	99.02
10.5	19,639,209		0.0000	1.0000	99.02
11.5	18,430,565		0.0000	1.0000	99.02
12.5	18,440,313		0.0000	1.0000	99.02
13.5	18,388,372		0.0000	1.0000	99.02
14.5	17,198,591		0.0000	1.0000	99.02
15.5	17,273,003		0.0000	1.0000	99.02
16.5	27,346,025		0.0000	1.0000	99.02
17.5	27,628,624		0.0000	1.0000	99.02
18.5	29,200,549		0.0000	1.0000	99.02
19.5	29,182,417		0.0000	1.0000	99.02
20.5	29,293,904		0.0000	1.0000	99.02
21.5	30,721,468		0.0000	1.0000	99.02
22.5	31,707,715		0.0000	1.0000	99.02
23.5	33,818,219	13,271	0.0004	0.9996	99.02
24.5	33,876,098		0.0000	1.0000	98.98
25.5	35,348,375		0.0000	1.0000	98.98
26.5	39,429,257	65,617	0.0017	0.9983	98.98
27.5	39,274,533	1,396	0.0000	1.0000	98.81
28.5	39,252,612	197,289	0.0050	0.9950	98.81
29.5	38,981,368	145,023	0.0037	0.9963	98.31
30.5	38,182,821	63,005	0.0017	0.9983	97.95
31.5	37,799,937	530	0.0000	1.0000	97.79
32.5	37,244,834		0.0000	1.0000	97.79
33.5	37,071,571	125,650	0.0034	0.9966	97.79
34.5	36,821,858		0.0000	1.0000	97.45
35.5	36,473,219	105,963	0.0029	0.9971	97.45
36.5	35,795,389		0.0000	1.0000	97.17
37.5	35,703,365	50,981	0.0014	0.9986	97.17
38.5	28,064,509	140,974	0.0050	0.9950	97.03

## ORIGINAL LIFE TABLE, CONT.

EXPERIENCE ANALYSIS  
EXPERIENCE BAND 1994-2024

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	27,244,849	35,598	0.0013	0.9987	96.55
40.5	27,209,251		0.0000	1.0000	96.42
41.5	23,297,302		0.0000	1.0000	96.42
42.5	23,219,292	102,276	0.0044	0.9956	96.42
43.5	23,258,426	80,896	0.0035	0.9965	95.99
44.5	23,776,055	27,436	0.0012	0.9988	95.66
45.5	23,748,619	118,196	0.0050	0.9950	95.55
46.5	23,556,012	14,052	0.0006	0.9994	95.07
47.5	14,175,891	632	0.0000	1.0000	95.02
48.5	13,783,759		0.0000	1.0000	95.01
49.5	11,610,362	227	0.0000	1.0000	95.01
50.5	11,610,667		0.0000	1.0000	95.01
51.5	11,495,794	70,501	0.0061	0.9939	95.01
52.5	9,398,385	22,196	0.0024	0.9976	94.43
53.5	8,339,206		0.0000	1.0000	94.21
54.5	6,382,347	20,015	0.0031	0.9969	94.21
55.5	6,291,181		0.0000	1.0000	93.91
56.5	4,735,884		0.0000	1.0000	93.91
57.5	935,576		0.0000	1.0000	93.91
58.5	932,508		0.0000	1.0000	93.91
59.5	927,256		0.0000	1.0000	93.91
60.5	910,336	1,794	0.0020	0.9980	93.91
61.5	1,525,799		0.0000	1.0000	93.73
62.5	1,467,469	152	0.0001	0.9999	93.73
63.5	1,467,317	337	0.0002	0.9998	93.72
64.5	1,464,986	2,581	0.0018	0.9982	93.69
65.5	1,458,568	2,674	0.0018	0.9982	93.53
66.5	1,431,639		0.0000	1.0000	93.36
67.5	1,417,299	35,881	0.0253	0.9747	93.36
68.5	1,381,418		0.0000	1.0000	90.99
69.5	1,381,418		0.0000	1.0000	90.99
70.5	1,381,418		0.0000	1.0000	90.99
71.5	1,283,356	1,751	0.0014	0.9986	90.99
72.5	1,252,118		0.0000	1.0000	90.87
73.5	1,252,117		0.0000	1.0000	90.87
74.5	1,103,633		0.0000	1.0000	90.87
75.5	659,413	728	0.0011	0.9989	90.87
76.5	658,685		0.0000	1.0000	90.77
77.5	658,685		0.0000	1.0000	90.77
78.5	658,685		0.0000	1.0000	90.77

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 354.00 TOWERS AND FIXTURES

ORIGINAL LIFE TABLE, CONT.

AVG AGE RET 36.5 PLACEMENT BAND 1932-2023		001	EXPERIENCE ANALYSIS EXPERIENCE BAND 1994-2024			
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL	
79.5	658,685	2,594	0.0039	0.9961	90.77	
80.5	618,991	419	0.0007	0.9993	90.41	
81.5	618,042		0.0000	1.0000	90.35	
82.5	617,783	456	0.0007	0.9993	90.35	
83.5	617,326	8,548	0.0138	0.9862	90.28	
84.5	606,247		0.0000	1.0000	89.03	
85.5	605,024		0.0000	1.0000	89.03	
86.5	605,024		0.0000	1.0000	89.03	
87.5	605,024		0.0000	1.0000	89.03	
88.5	605,024		0.0000	1.0000	89.03	
89.5	605,024		0.0000	1.0000	89.03	
90.5	605,024		0.0000	1.0000	89.03	
91.5	605,024		0.0000	1.0000	89.03	
92.5					89.03	
TOTAL	1,374,814,777	1,562,647				

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 354.00 TOWERS AND FIXTURES

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1932-2023      001      EXPERIENCE BAND 1994-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
200.2-S0	1.57	0 - 93			NOT FITTED
186.6-S0.5	0.91	0 - 93			NOT FITTED
156.5-S1	1.69	0 - 93			NOT FITTED
139.5-S1.5	2.17	0 - 93			NOT FITTED
200.2-R0.5	5.08	0 - 93			NOT FITTED
200.2-R1	2.66	0 - 93			NOT FITTED
200.2-R1.5	0.85	0 - 93			NOT FITTED
170.2-R2	0.59	0 - 93			NOT FITTED
143.1-R2.5	1.00	0 - 93			NOT FITTED
122.6-R3	2.03	0 - 93			NOT FITTED
200.2-L0	6.14	0 - 93			NOT FITTED
200.2-L0.5	3.60	0 - 93			NOT FITTED
200.2-L1	1.39	0 - 93			NOT FITTED
177.8-L1.5	1.29	0 - 93			NOT FITTED
149.8-L2	2.24	0 - 93			NOT FITTED
134.8-L2.5	2.68	0 - 93			NOT FITTED
200.2-O1	7.51	0 - 93			NOT FITTED
200.2-O2	9.16	0 - 93			NOT FITTED
200.2-O3	15.40	0 - 93			NOT FITTED
200.2-O4	21.44	0 - 93			NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 355.00 POLES AND FIXTURES

INPUT CONTROL TOTALS THROUGH 2024

TRAN CODE	----- T O T A L I N P U T D A T A ----- AGED UNAGED TOTAL
0	4,876,121.64- 0.00 4,876,121.64-
3	12,789,738.07- 0.00 12,789,738.07-
9	78,559,903.63 0.00 78,559,903.63
TOTAL DATA	60,894,043.92 0.00 60,894,043.92
8	60,894,043.92 0.00 60,894,043.92

## ORIGINAL LIFE TABLE

EXPERIENCE ANALYSIS  
EXPERIENCE BAND 1994-2024

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	57,904,197	41,475	0.0007	0.9993	100.00
0.5	59,682,550	263,581	0.0044	0.9956	99.93
1.5	51,567,397	345,654	0.0067	0.9933	99.49
2.5	49,968,829	189,508	0.0038	0.9962	98.82
3.5	48,078,019	736,526	0.0153	0.9847	98.45
4.5	48,645,436	166,885	0.0034	0.9966	96.94
5.5	45,317,345	121,850	0.0027	0.9973	96.60
6.5	43,562,634	58,502	0.0013	0.9987	96.34
7.5	43,026,519	176,209	0.0041	0.9959	96.22
8.5	34,141,355	240,880	0.0071	0.9929	95.82
9.5	30,023,804	100,520	0.0033	0.9967	95.15
10.5	26,697,719	92,062	0.0034	0.9966	94.83
11.5	24,146,538	61,393	0.0025	0.9975	94.50
12.5	22,570,745	14,622	0.0006	0.9994	94.26
13.5	21,685,238	21,938	0.0010	0.9990	94.20
14.5	17,883,664	4,300	0.0002	0.9998	94.10
15.5	17,468,233	47,824	0.0027	0.9973	94.08
16.5	18,596,295	9,584	0.0005	0.9995	93.82
17.5	18,501,107	15,320	0.0008	0.9992	93.77
18.5	18,825,923	86,879	0.0046	0.9954	93.70
19.5	18,878,004	39,952	0.0021	0.9979	93.26
20.5	18,850,378	77,461	0.0041	0.9959	93.07
21.5	18,391,492	54,452	0.0030	0.9970	92.68
22.5	18,315,330	42,316	0.0023	0.9977	92.41
23.5	17,548,899	43,113	0.0025	0.9975	92.20
24.5	17,321,476	55,881	0.0032	0.9968	91.97
25.5	16,923,640	95,017	0.0056	0.9944	91.67
26.5	16,882,841	69,662	0.0041	0.9959	91.16
27.5	15,897,528	26,935	0.0017	0.9983	90.78
28.5	15,451,545	34,410	0.0022	0.9978	90.63
29.5	14,938,177	98,293	0.0066	0.9934	90.43
30.5	13,825,012	34,839	0.0025	0.9975	89.83
31.5	13,182,508	46,064	0.0035	0.9965	89.61
32.5	12,690,701	244,974	0.0193	0.9807	89.29
33.5	12,011,500	104,670	0.0087	0.9913	87.57
34.5	11,316,517	72,422	0.0064	0.9936	86.81
35.5	9,690,684	55,175	0.0057	0.9943	86.25
36.5	9,061,074	38,896	0.0043	0.9957	85.76
37.5	8,103,792	43,410	0.0054	0.9946	85.39
38.5	7,832,443	76,233	0.0097	0.9903	84.93

ORIGINAL LIFE TABLE, CONT.

EXPERIENCE ANALYSIS  
EXPERIENCE BAND 1994-2024

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	7,347,028	83,088	0.0113	0.9887	84.11
40.5	7,374,765	48,218	0.0065	0.9935	83.16
41.5	7,265,221	19,831	0.0027	0.9973	82.61
42.5	7,031,404	16,644	0.0024	0.9976	82.39
43.5	6,761,183	40,301	0.0060	0.9940	82.19
44.5	6,356,858	87,774	0.0138	0.9862	81.70
45.5	6,118,268	76,818	0.0126	0.9874	80.57
46.5	5,972,288	18,421	0.0031	0.9969	79.56
47.5	3,946,170	11,283	0.0029	0.9971	79.32
48.5	3,855,414	61,688	0.0160	0.9840	79.09
49.5	3,745,188	37,853	0.0101	0.9899	77.82
50.5	3,633,101	10,398	0.0029	0.9971	77.04
51.5	3,347,064	44,050	0.0132	0.9868	76.82
52.5	2,815,768	6,990	0.0025	0.9975	75.81
53.5	2,320,466	23,371	0.0101	0.9899	75.62
54.5	2,131,427	17,241	0.0081	0.9919	74.86
55.5	1,744,116	5,363	0.0031	0.9969	74.25
56.5	1,665,984	28,101	0.0169	0.9831	74.02
57.5	1,636,726	2,954	0.0018	0.9982	72.77
58.5	1,558,215	6,900	0.0044	0.9956	72.64
59.5	1,448,665	5,123	0.0035	0.9965	72.32
60.5	1,432,042	4,932	0.0034	0.9966	72.07
61.5	1,383,690	5,232	0.0038	0.9962	71.82
62.5	962,157	44,242	0.0460	0.9540	71.55
63.5	796,343	3,772	0.0047	0.9953	68.26
64.5	792,528	2,508	0.0032	0.9968	67.93
65.5	789,990	1,660	0.0021	0.9979	67.72
66.5	789,446	7,485	0.0095	0.9905	67.58
67.5	780,184	587	0.0008	0.9992	66.93
68.5	758,693	3,605	0.0048	0.9952	66.88
69.5	755,000		0.0000	1.0000	66.57
70.5	754,791		0.0000	1.0000	66.57
71.5	357,548		0.0000	1.0000	66.57
72.5	168,626		0.0000	1.0000	66.57
73.5	168,534		0.0000	1.0000	66.57
74.5	150,289		0.0000	1.0000	66.57
75.5	150,289		0.0000	1.0000	66.57
76.5	150,289		0.0000	1.0000	66.57
77.5	150,289		0.0000	1.0000	66.57
78.5	150,289		0.0000	1.0000	66.57



INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 355.00 POLES AND FIXTURES

ORIGINAL LIFE TABLE, CONT.

AVG AGE RET 18.9 PLACEMENT BAND 1942-2024		001	EXPERIENCE ANALYSIS EXPERIENCE BAND 1994-2024		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	150,289		0.0000	1.0000	66.57
80.5	21		0.0000	1.0000	66.57
81.5	21		0.0000	1.0000	66.57
82.5					66.57
TOTAL	1,085,073,755	4,876,120			

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 355.00 POLES AND FIXTURES

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1942-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
84.2-S0	2.17	0 - 72		87.8-S0	1.30	38 - 72
77.8-S0.5	3.45	0 - 72		82.3-S0.5	2.43	38 - 72
72.9-S1	5.19	0 - 72		78.2-S1	3.81	38 - 72
69.6-S1.5	6.68	0 - 72		74.8-S1.5	5.32	38 - 72
97.7-R0.5	1.44	0 - 72		NOT FITTED		
84.2-R1	1.02	0 - 72		84.3-R1	0.92	38 - 72
76.2-R1.5	2.09	0 - 72		78.2-R1.5	2.05	38 - 72
70.5-R2	4.11	0 - 72		73.8-R2	3.68	38 - 72
109.2-L0	1.18	0 - 72		NOT FITTED		
96.8-L0.5	1.70	0 - 72		NOT FITTED		
87.4-L1	3.14	0 - 72		92.8-L1	2.00	38 - 72
80.4-L1.5	4.59	0 - 72		85.9-L1.5	3.49	38 - 72
115.3-O1	1.98	0 - 72		NOT FITTED		
129.6-O2	1.97	0 - 72		NOT FITTED		
186.1-O3	2.17	0 - 72		NOT FITTED		
200.2-O4	4.09	0 - 72		NOT FITTED		

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 356.00 OVERHEAD CONDUCTORS AND DEVICES

INPUT CONTROL TOTALS THROUGH 2024

TRAN CODE	----- T O T A L I N P U T D A T A ----- AGED UNAGED TOTAL
0	3,409,394.52- 0.00 3,409,394.52-
3	9,736,188.12- 0.00 9,736,188.12-
9	86,249,825.40 0.00 86,249,825.40
TOTAL DATA	73,104,242.76 0.00 73,104,242.76
8	73,104,242.76 0.00 73,104,242.76

## ORIGINAL LIFE TABLE

EXPERIENCE ANALYSIS  
EXPERIENCE BAND 1994-2024

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	44,540,136	23,312	0.0005	0.9995	100.00
0.5	46,103,840	319,171	0.0069	0.9931	99.95
1.5	39,296,624	349,027	0.0089	0.9911	99.26
2.5	36,388,931	319,854	0.0088	0.9912	98.37
3.5	35,561,426	55,565	0.0016	0.9984	97.51
4.5	30,688,770	44,475	0.0014	0.9986	97.36
5.5	30,443,041	10,372	0.0003	0.9997	97.22
6.5	30,804,371	93,959	0.0031	0.9969	97.18
7.5	32,316,956	130,291	0.0040	0.9960	96.89
8.5	25,826,269	21,499	0.0008	0.9992	96.50
9.5	25,561,681	130,476	0.0051	0.9949	96.42
10.5	28,266,542	61,325	0.0022	0.9978	95.92
11.5	27,102,658	6,029	0.0002	0.9998	95.72
12.5	25,853,463	62	0.0000	1.0000	95.69
13.5	25,377,497	4,854	0.0002	0.9998	95.69
14.5	22,940,026	570	0.0000	1.0000	95.68
15.5	23,188,580	56,971	0.0025	0.9975	95.67
16.5	30,159,936	44,016	0.0015	0.9985	95.44
17.5	30,351,302	3,871	0.0001	0.9999	95.30
18.5	31,853,737	24,208	0.0008	0.9992	95.29
19.5	31,913,191	4,043	0.0001	0.9999	95.21
20.5	32,034,684	42,962	0.0013	0.9987	95.20
21.5	33,414,877	22,806	0.0007	0.9993	95.07
22.5	34,426,884	40,594	0.0012	0.9988	95.01
23.5	35,616,607	15,263	0.0004	0.9996	94.90
24.5	35,856,242	14,913	0.0004	0.9996	94.86
25.5	36,975,824	69,436	0.0019	0.9981	94.82
26.5	41,056,927	47,879	0.0012	0.9988	94.64
27.5	40,508,359	20,747	0.0005	0.9995	94.53
28.5	40,085,151	197,359	0.0049	0.9951	94.48
29.5	38,884,304	43,289	0.0011	0.9989	94.02
30.5	36,578,505	23,236	0.0006	0.9994	93.91
31.5	35,307,925	11,199	0.0003	0.9997	93.85
32.5	34,867,379	18,713	0.0005	0.9995	93.82
33.5	33,746,115	60,955	0.0018	0.9982	93.77
34.5	33,354,501	158,039	0.0047	0.9953	93.60
35.5	32,725,267	285,342	0.0087	0.9913	93.16
36.5	32,098,591	48,550	0.0015	0.9985	92.35
37.5	31,249,915	7,177	0.0002	0.9998	92.21
38.5	28,644,273	33,416	0.0012	0.9988	92.18

## ORIGINAL LIFE TABLE, CONT.

EXPERIENCE ANALYSIS  
EXPERIENCE BAND 1994-2024

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	27,604,452	66,923	0.0024	0.9976	92.08
40.5	27,342,749	33,162	0.0012	0.9988	91.85
41.5	24,021,692	38,203	0.0016	0.9984	91.74
42.5	23,558,886	16,474	0.0007	0.9993	91.60
43.5	23,381,402	53,954	0.0023	0.9977	91.53
44.5	22,870,520	15,800	0.0007	0.9993	91.32
45.5	22,652,961	8,795	0.0004	0.9996	91.26
46.5	21,903,378	27,035	0.0012	0.9988	91.22
47.5	14,892,475	16,498	0.0011	0.9989	91.11
48.5	14,611,677	26,781	0.0018	0.9982	91.01
49.5	13,250,796	36,058	0.0027	0.9973	90.84
50.5	12,827,777	6,508	0.0005	0.9995	90.60
51.5	12,384,388	20,860	0.0017	0.9983	90.55
52.5	10,285,411	2,687	0.0003	0.9997	90.40
53.5	8,757,572	29,039	0.0033	0.9967	90.37
54.5	7,584,711	8,058	0.0011	0.9989	90.07
55.5	7,055,053	9,504	0.0013	0.9987	89.98
56.5	5,628,940	4,736	0.0008	0.9992	89.86
57.5	1,438,248	11,927	0.0083	0.9917	89.78
58.5	1,262,125	11,652	0.0092	0.9908	89.04
59.5	1,123,583	24,264	0.0216	0.9784	88.21
60.5	936,691	7,579	0.0081	0.9919	86.31
61.5	913,065	16,595	0.0182	0.9818	85.61
62.5	572,554	10,425	0.0182	0.9818	84.06
63.5	495,458	12,480	0.0252	0.9748	82.52
64.5	482,063	3,591	0.0074	0.9926	80.45
65.5	478,461	3,495	0.0073	0.9927	79.85
66.5	478,084	2,297	0.0048	0.9952	79.26
67.5	415,782	7,071	0.0170	0.9830	78.88
68.5	387,251	61	0.0002	0.9998	77.54
69.5	387,191	3,542	0.0091	0.9909	77.53
70.5	383,649	6,253	0.0163	0.9837	76.82
71.5	377,396	16	0.0000	1.0000	75.57
72.5	373,527		0.0000	1.0000	75.56
73.5	362,089		0.0000	1.0000	75.56
74.5	342,211	53	0.0002	0.9998	75.56
75.5	342,006		0.0000	1.0000	75.55
76.5	341,941	2	0.0000	1.0000	75.55
77.5	341,938	213	0.0006	0.9994	75.55
78.5	341,725	246	0.0007	0.9993	75.51

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 356.00 OVERHEAD CONDUCTORS AND DEVICES

ORIGINAL LIFE TABLE, CONT.

AVG AGE RET 21.3 PLACEMENT BAND 1932-2024		001	EXPERIENCE ANALYSIS EXPERIENCE BAND 1994-2024			
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL	
79.5	341,479		0.0000	1.0000	75.45	
80.5	37,386	233	0.0062	0.9938	75.45	
81.5	37,153		0.0000	1.0000	74.98	
82.5	37,153	4	0.0001	0.9999	74.98	
83.5	37,148		0.0000	1.0000	74.97	
84.5	37,148	79	0.0021	0.9979	74.97	
85.5	37,069	23	0.0006	0.9994	74.81	
86.5	37,046	310	0.0084	0.9916	74.77	
87.5	36,736	82	0.0022	0.9978	74.14	
88.5	36,655		0.0000	1.0000	73.98	
89.5	36,655		0.0000	1.0000	73.98	
90.5	36,655		0.0000	1.0000	73.98	
91.5	36,655		0.0000	1.0000	73.98	
92.5					73.98	
TOTAL	1,635,948,123	3,409,393				

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 356.00 OVERHEAD CONDUCTORS AND DEVICES

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1932-2024      001      EXPERIENCE BAND 1994-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
124.2-S0	2.41	0 - 68			
107.6-S0.5	2.77	0 - 68			NOT FITTED
94.6-S1	3.62	0 - 68			NOT FITTED
86.5-S1.5	4.19	0 - 68			NOT FITTED
178.3-R0.5	1.90	0 - 68			NOT FITTED
139.9-R1	1.85	0 - 68			NOT FITTED
114.6-R1.5	1.84	0 - 68			NOT FITTED
95.7-R2	2.25	0 - 68			NOT FITTED
84.8-R2.5	2.89	0 - 68			NOT FITTED
178.4-L0	2.07	0 - 68			NOT FITTED
146.4-L0.5	2.18	0 - 68			NOT FITTED
121.9-L1	2.79	0 - 68			NOT FITTED
106.0-L1.5	3.23	0 - 68			NOT FITTED
200.2-O1	2.22	0 - 68			NOT FITTED
200.2-O2	3.01	0 - 68			NOT FITTED
200.2-O3	7.41	0 - 68			NOT FITTED
200.2-O4	12.29	0 - 68			NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING



INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 357.00 UNDERGROUND CONDUIT

INPUT CONTROL TOTALS THROUGH 2024

TRAN CODE	----- T O T A L I N P U T D A T A ----- AGEDUNAGEDTOTAL		
0	72,529.24-	0.00	72,529.24-
3	1,386,378.77-	0.00	1,386,378.77-
9	1,472,357.57	0.00	1,472,357.57
TOTAL DATA	13,449.56	0.00	13,449.56
8	13,449.56	0.00	13,449.56

## ORIGINAL LIFE TABLE

EXPERIENCE ANALYSIS  
EXPERIENCE BAND 1994-2024

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	163,250		0.0000	1.0000	100.00
0.5	173,042		0.0000	1.0000	100.00
1.5	362,283		0.0000	1.0000	100.00
2.5	389,086	2,342	0.0060	0.9940	100.00
3.5	437,063		0.0000	1.0000	99.40
4.5	702,501	528	0.0008	0.9992	99.40
5.5	785,099	528	0.0007	0.9993	99.32
6.5	785,553		0.0000	1.0000	99.26
7.5	858,986		0.0000	1.0000	99.26
8.5	965,252		0.0000	1.0000	99.26
9.5	964,992		0.0000	1.0000	99.26
10.5	964,901	1,221	0.0013	0.9987	99.26
11.5	962,791	315	0.0003	0.9997	99.13
12.5	962,459		0.0000	1.0000	99.10
13.5	962,459	1,136	0.0012	0.9988	99.10
14.5	766,742	12,191	0.0159	0.9841	98.98
15.5	754,551		0.0000	1.0000	97.41
16.5	658,843	9,602	0.0146	0.9854	97.41
17.5	675,380	1,503	0.0022	0.9978	95.99
18.5	829,692	12,943	0.0156	0.9844	95.77
19.5	698,824	3,369	0.0048	0.9952	94.28
20.5	636,452		0.0000	1.0000	93.83
21.5	296,296		0.0000	1.0000	93.83
22.5	196,949		0.0000	1.0000	93.83
23.5	288,706		0.0000	1.0000	93.83
24.5	300,999		0.0000	1.0000	93.83
25.5	311,359	350	0.0011	0.9989	93.83
26.5	311,009		0.0000	1.0000	93.72
27.5	311,009		0.0000	1.0000	93.72
28.5	311,009	309	0.0010	0.9990	93.72
29.5	309,761	703	0.0023	0.9977	93.63
30.5	323,011	175	0.0005	0.9995	93.41
31.5	322,356		0.0000	1.0000	93.36
32.5	322,365	3,011	0.0093	0.9907	93.36
33.5	332,640	9,089	0.0273	0.9727	92.49
34.5	299,252		0.0000	1.0000	89.97
35.5	171,044		0.0000	1.0000	89.97
36.5	172,822		0.0000	1.0000	89.97
37.5	172,972	851	0.0049	0.9951	89.97
38.5	160,532	12,190	0.0759	0.9241	89.52

## ORIGINAL LIFE TABLE, CONT.

EXPERIENCE ANALYSIS  
EXPERIENCE BAND 1994-2024

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	139,186		0.0000	1.0000	82.72
40.5	63,317		0.0000	1.0000	82.72
41.5	157,197		0.0000	1.0000	82.72
42.5	167,352		0.0000	1.0000	82.72
43.5	287,754		0.0000	1.0000	82.72
44.5	306,817		0.0000	1.0000	82.72
45.5	306,871		0.0000	1.0000	82.72
46.5	303,148		0.0000	1.0000	82.72
47.5	289,861		0.0000	1.0000	82.72
48.5	289,479		0.0000	1.0000	82.72
49.5	263,910	19	0.0001	0.9999	82.72
50.5	262,113		0.0000	1.0000	82.72
51.5	261,963		0.0000	1.0000	82.72
52.5	261,963		0.0000	1.0000	82.72
53.5	260,966		0.0000	1.0000	82.72
54.5	260,966		0.0000	1.0000	82.72
55.5	167,462		0.0000	1.0000	82.72
56.5	157,510		0.0000	1.0000	82.72
57.5	36,974		0.0000	1.0000	82.72
58.5	4,255	10	0.0024	0.9976	82.72
59.5	4,192		0.0000	1.0000	82.52
60.5	4,192		0.0000	1.0000	82.52
61.5	4,192		0.0000	1.0000	82.52
62.5	4,192		0.0000	1.0000	82.52
63.5	2,166		0.0000	1.0000	82.52
64.5	2,166	144	0.0667	0.9333	82.52
65.5	2,021		0.0000	1.0000	77.02
66.5	2,021		0.0000	1.0000	77.02
67.5	1,943		0.0000	1.0000	77.02
68.5	1,943		0.0000	1.0000	77.02
69.5	1,568		0.0000	1.0000	77.02
70.5	1,365		0.0000	1.0000	77.02
71.5	1,365		0.0000	1.0000	77.02
72.5	1,212		0.0000	1.0000	77.02
73.5	1,212		0.0000	1.0000	77.02
74.5	1,212		0.0000	1.0000	77.02
75.5	1,212		0.0000	1.0000	77.02
76.5	1,212		0.0000	1.0000	77.02
77.5					77.02
78.5	356		0.0000		

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 357.00 UNDERGROUND CONDUIT

ORIGINAL LIFE TABLE, CONT.

AVG AGE RET 23.5 PLACEMENT BAND 1912-2024		001	EXPERIENCE ANALYSIS EXPERIENCE BAND 1994-2024		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	356		0.0000		
80.5	356		0.0000		
81.5	503		0.0000		
82.5	503		0.0000		
83.5	503		0.0000		
84.5	503		0.0000		
85.5	503		0.0000		
86.5	503		0.0000		
87.5	503		0.0000		
88.5	503		0.0000		
89.5	503		0.0000		
90.5	503		0.0000		
91.5	503		0.0000		
92.5	147		0.0000		
93.5	147		0.0000		
94.5	147		0.0000		
95.5					
TOTAL	24,669,784	72,529			

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 357.00 UNDERGROUND CONDUIT

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1912-2024      001      EXPERIENCE BAND 1994-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
99.5-S0	2.04	0 - 59			
87.1-S0.5	2.53	0 - 59			NOT FITTED
77.6-S1	3.54	0 - 59			NOT FITTED
71.5-S1.5	4.42	0 - 59			NOT FITTED
136.7-R0.5	2.26	0 - 59			NOT FITTED
108.8-R1	2.09	0 - 59			NOT FITTED
90.7-R1.5	2.04	0 - 59			NOT FITTED
77.4-R2	2.50	0 - 59			NOT FITTED
69.5-R2.5	3.40	0 - 59			NOT FITTED
140.3-L0	1.86	0 - 59			NOT FITTED
116.7-L0.5	1.97	0 - 59			NOT FITTED
98.8-L1	2.59	0 - 59			NOT FITTED
86.8-L1.5	3.25	0 - 59			NOT FITTED
169.2-O1	2.36	0 - 59			NOT FITTED
190.2-O2	2.36	0 - 59			NOT FITTED
200.2-O3	3.82	0 - 59			NOT FITTED
200.2-O4	7.89	0 - 59			NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 358.00 UNDERGROUND CONDUCTORS AND DEVICES

INPUT CONTROL TOTALS THROUGH 2024

TRAN CODE	----- T O T A L I N P U T D A T A ----- AGED	UNAGED	TOTAL
0	991,304.63-	0.00	991,304.63-
3	1,901,390.76-	0.00	1,901,390.76-
9	3,393,644.52	0.00	3,393,644.52
TOTAL DATA	500,949.13	0.00	500,949.13
8	500,949.13	0.00	500,949.13

## ORIGINAL LIFE TABLE

EXPERIENCE ANALYSIS  
EXPERIENCE BAND 1994-2024

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	1,778,198	11,376	0.0064	0.9936	100.00
0.5	1,870,326		0.0000	1.0000	99.36
1.5	1,938,593	37,438	0.0193	0.9807	99.36
2.5	1,503,436		0.0000	1.0000	97.44
3.5	1,480,321	16,062	0.0109	0.9891	97.44
4.5	1,617,780	34,125	0.0211	0.9789	96.38
5.5	1,603,958	67,675	0.0422	0.9578	94.35
6.5	1,501,952	93,842	0.0625	0.9375	90.37
7.5	1,412,816		0.0000	1.0000	84.72
8.5	1,737,908	36,263	0.0209	0.9791	84.72
9.5	1,697,870	34,174	0.0201	0.9799	82.96
10.5	1,594,696	3,158	0.0020	0.9980	81.29
11.5	768,230	1,590	0.0021	0.9979	81.13
12.5	769,471		0.0000	1.0000	80.96
13.5	769,471		0.0000	1.0000	80.96
14.5	657,198	70,503	0.1073	0.8927	80.96
15.5	609,865		0.0000	1.0000	72.27
16.5	517,344	24,539	0.0474	0.9526	72.27
17.5	478,289	3,151	0.0066	0.9934	68.84
18.5	730,393	98,157	0.1344	0.8656	68.39
19.5	601,725		0.0000	1.0000	59.20
20.5	601,276		0.0000	1.0000	59.20
21.5	602,568		0.0000	1.0000	59.20
22.5	477,116	2,826	0.0059	0.9941	59.20
23.5	514,188	3,264	0.0063	0.9937	58.85
24.5	545,137		0.0000	1.0000	58.48
25.5	470,655	20,454	0.0435	0.9565	58.48
26.5	450,200		0.0000	1.0000	55.93
27.5	452,141	68,795	0.1522	0.8478	55.93
28.5	386,442	89,456	0.2315	0.7685	47.42
29.5	296,986		0.0000	1.0000	36.45
30.5	324,069		0.0000	1.0000	36.45
31.5	324,069		0.0000	1.0000	36.45
32.5	187,448		0.0000	1.0000	36.45
33.5	193,936	13,449	0.0693	0.9307	36.45
34.5	168,950	1,366	0.0081	0.9919	33.92
35.5	150,445		0.0000	1.0000	33.64
36.5	150,445		0.0000	1.0000	33.64
37.5	131,290	8,944	0.0681	0.9319	33.64
38.5	107,861	6,939	0.0643	0.9357	31.35



INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 358.00 UNDERGROUND CONDUCTORS AND DEVICES

ORIGINAL LIFE TABLE, CONT.

AVG AGE RET 24.6 PLACEMENT BAND 1938-2022		001	EXPERIENCE ANALYSIS EXPERIENCE BAND 1994-2024		
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	98,628	18,174	0.1843	0.8157	29.34
40.5	62,607	17,011	0.2717	0.7283	23.93
41.5	43,532		0.0000	1.0000	17.43
42.5	101,724		0.0000	1.0000	17.43
43.5	219,362	6,489	0.0296	0.9704	17.43
44.5	239,681		0.0000	1.0000	16.91
45.5	238,246	5,875	0.0247	0.9753	16.91
46.5	222,652		0.0000	1.0000	16.50
47.5	221,525		0.0000	1.0000	16.50
48.5	221,525		0.0000	1.0000	16.50
49.5	221,525		0.0000	1.0000	16.50
50.5	221,525		0.0000	1.0000	16.50
51.5	221,525	530	0.0024	0.9976	16.50
52.5	220,995	73,226	0.3313	0.6687	16.46
53.5	148,011	117,638	0.7948	0.2052	11.00
54.5	30,373		0.0000	1.0000	2.26
55.5	47,667		0.0000	1.0000	2.26
56.5	47,667		0.0000	1.0000	2.26
57.5	47,667		0.0000	1.0000	2.26
58.5	19,196		0.0000	1.0000	2.26
59.5	17,536		0.0000	1.0000	2.26
60.5	17,536		0.0000	1.0000	2.26
61.5	17,536		0.0000	1.0000	2.26
62.5	17,536	4,819	0.2748	0.7252	2.26
63.5	12,717		0.0000	1.0000	1.64
64.5	12,717		0.0000	1.0000	1.64
65.5	12,717		0.0000	1.0000	1.64
66.5	12,717		0.0000	1.0000	1.64
67.5	12,475		0.0000	1.0000	1.64
68.5	12,475		0.0000	1.0000	1.64
69.5	258		0.0000	1.0000	1.64
70.5	258		0.0000	1.0000	1.64
71.5	258		0.0000	1.0000	1.64
72.5					1.64
TOTAL	35,217,431	991,308			

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 358.00 UNDERGROUND CONDUCTORS AND DEVICES

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1938-2022			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
28.1-S0	6.19	0 - 59		28.1-S0	6.85	7 - 54
28.1-S0.5	7.73	0 - 59		28.2-S0.5	8.52	7 - 54
28.1-S1	9.51	0 - 59		28.2-S1	10.49	7 - 54
28.1-S1.5	11.13	0 - 59		28.2-S1.5	12.31	7 - 54
28.1-R0.5	4.96	0 - 59		27.9-R0.5	5.52	7 - 54
28.1-R1	7.08	0 - 59		28.0-R1	7.91	7 - 54
28.1-R1.5	8.87	0 - 59		28.1-R1.5	9.88	7 - 54
28.1-R2	10.95	0 - 59		28.1-R2	12.20	7 - 54
28.8-L0	3.78	0 - 59		29.1-L0	3.64	7 - 54
28.5-L0.5	3.92	0 - 59		28.8-L0.5	4.05	7 - 54
28.3-L1	5.01	0 - 59		28.6-L1	5.36	7 - 54
28.2-L1.5	6.65	0 - 59		28.5-L1.5	7.21	7 - 54
28.1-O1	4.31	0 - 59		27.8-O1	4.65	7 - 54
29.7-O2	4.49	0 - 59		30.0-O2	3.84	7 - 54
34.1-O3	8.55	0 - 59		35.2-O3	7.43	7 - 54
39.8-O4	11.17	0 - 59		41.8-O4	9.76	7 - 54

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 360.50 LAND RIGHTS

INPUT CONTROL TOTALS THROUGH 2024

TRAN CODE	----- T O T A L I N P U T D A T A ----- AGED	UNAGED	TOTAL
0	841.81-	0.00	841.81-
3	61,244.54	0.00	61,244.54
9	331,041.43	0.00	331,041.43
TOTAL DATA	391,444.16	0.00	391,444.16
8	391,444.16	0.00	391,444.16

## ORIGINAL LIFE TABLE

EXPERIENCE ANALYSIS  
EXPERIENCE BAND 1994-2024

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	73,634		0.0000	1.0000	100.00
0.5	78,441	48	0.0006	0.9994	100.00
1.5	89,733	13	0.0001	0.9999	99.94
2.5	93,802	551	0.0059	0.9941	99.92
3.5	95,658	9	0.0001	0.9999	99.34
4.5	97,184	21	0.0002	0.9998	99.33
5.5	99,041	30	0.0003	0.9997	99.31
6.5	101,117	7	0.0001	0.9999	99.28
7.5	103,503		0.0000	1.0000	99.27
8.5	111,656	9	0.0001	0.9999	99.27
9.5	111,148	7	0.0001	0.9999	99.26
10.5	112,527	18	0.0002	0.9998	99.26
11.5	108,710	18	0.0002	0.9998	99.24
12.5	99,980		0.0000	1.0000	99.22
13.5	98,652		0.0000	1.0000	99.22
14.5	99,630	9	0.0001	0.9999	99.22
15.5	111,432	11	0.0001	0.9999	99.21
16.5	162,040		0.0000	1.0000	99.20
17.5	150,942	4	0.0000	1.0000	99.20
18.5	204,267	4	0.0000	1.0000	99.20
19.5	195,468		0.0000	1.0000	99.20
20.5	211,506		0.0000	1.0000	99.20
21.5	222,311		0.0000	1.0000	99.20
22.5	234,153		0.0000	1.0000	99.20
23.5	236,260	3	0.0000	1.0000	99.20
24.5	276,309		0.0000	1.0000	99.20
25.5	278,098	3	0.0000	1.0000	99.20
26.5	279,252		0.0000	1.0000	99.20
27.5	278,457	7	0.0000	1.0000	99.20
28.5	229,996		0.0000	1.0000	99.20
29.5	216,004	3	0.0000	1.0000	99.20
30.5	209,507	5	0.0000	1.0000	99.19
31.5	205,335		0.0000	1.0000	99.19
32.5	205,727		0.0000	1.0000	99.19
33.5	189,428		0.0000	1.0000	99.19
34.5	188,378	3	0.0000	1.0000	99.19
35.5	183,694		0.0000	1.0000	99.19
36.5	187,420		0.0000	1.0000	99.19
37.5	186,666	2	0.0000	1.0000	99.19
38.5	208,383		0.0000	1.0000	99.19

ORIGINAL LIFE TABLE, CONT.

AVG AGE RET 8.1  
PLACEMENT BAND 1905-2013

001

EXPERIENCE ANALYSIS  
EXPERIENCE BAND 1994-2024

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	222,610		0.0000	1.0000	99.19
40.5	219,752	2	0.0000	1.0000	99.19
41.5	206,456	1	0.0000	1.0000	99.19
42.5	200,042		0.0000	1.0000	99.19
43.5	221,584	1	0.0000	1.0000	99.19
44.5	220,664		0.0000	1.0000	99.19
45.5	219,733		0.0000	1.0000	99.19
46.5	220,353		0.0000	1.0000	99.19
47.5	217,158	6	0.0000	1.0000	99.19
48.5	216,539	1	0.0000	1.0000	99.18
49.5	157,578		0.0000	1.0000	99.18
50.5	152,256	43	0.0003	0.9997	99.18
51.5	147,226		0.0000	1.0000	99.16
52.5	132,397	1	0.0000	1.0000	99.16
53.5	116,855	1	0.0000	1.0000	99.16
54.5	113,017	2	0.0000	1.0000	99.15
55.5	71,772		0.0000	1.0000	99.15
56.5	56,152		0.0000	1.0000	99.15
57.5	47,483		0.0000	1.0000	99.15
58.5	48,176		0.0000	1.0000	99.15
59.5	45,573		0.0000	1.0000	99.15
60.5	37,893		0.0000	1.0000	99.15
61.5	35,551	1	0.0000	1.0000	99.15
62.5	35,013		0.0000	1.0000	99.15
63.5	33,880		0.0000	1.0000	99.15
64.5	32,824		0.0000	1.0000	99.15
65.5	33,396		0.0000	1.0000	99.15
66.5	32,895		0.0000	1.0000	99.15
67.5	26,886		0.0000	1.0000	99.15
68.5	27,245		0.0000	1.0000	99.15
69.5	27,088		0.0000	1.0000	99.15
70.5	26,165		0.0000	1.0000	99.15
71.5	24,980		0.0000	1.0000	99.15
72.5	22,554		0.0000	1.0000	99.15
73.5	23,409		0.0000	1.0000	99.15
74.5	13,021		0.0000	1.0000	99.15
75.5	21,564		0.0000	1.0000	99.15
76.5	21,187		0.0000	1.0000	99.15
77.5	21,133		0.0000	1.0000	99.15
78.5	16,458		0.0000	1.0000	99.15

ORIGINAL LIFE TABLE, CONT.

EXPERIENCE ANALYSIS  
EXPERIENCE BAND 1994-2024

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	19,429		0.0000	1.0000	99.15
80.5	19,174		0.0000	1.0000	99.15
81.5	18,801		0.0000	1.0000	99.15
82.5	20,135		0.0000	1.0000	99.15
83.5	24,410		0.0000	1.0000	99.15
84.5	23,662		0.0000	1.0000	99.15
85.5	23,467		0.0000	1.0000	99.15
86.5	23,470		0.0000	1.0000	99.15
87.5	23,515		0.0000	1.0000	99.15
88.5	23,438		0.0000	1.0000	99.15
89.5	22,604		0.0000	1.0000	99.15
90.5	21,438		0.0000	1.0000	99.15
91.5	21,352		0.0000	1.0000	99.15
92.5	13,934		0.0000	1.0000	99.15
93.5	10,578		0.0000	1.0000	99.15
94.5	10,446		0.0000	1.0000	99.15
95.5	10,437		0.0000	1.0000	99.15
96.5	10,365		0.0000	1.0000	99.15
97.5	10,166		0.0000	1.0000	99.15
98.5	10,001		0.0000	1.0000	99.15
99.5	5,951		0.0000	1.0000	99.15
100.5	786		0.0000	1.0000	99.15
101.5	368		0.0000	1.0000	99.15
102.5	340		0.0000	1.0000	99.15
103.5	324		0.0000	1.0000	99.15
104.5	74		0.0000	1.0000	99.15
105.5	72		0.0000	1.0000	99.15
106.5	71		0.0000	1.0000	99.15
107.5	71		0.0000	1.0000	99.15
108.5	31		0.0000	1.0000	99.15
109.5	31		0.0000	1.0000	99.15
110.5	31		0.0000	1.0000	99.15
111.5	31		0.0000	1.0000	99.15
112.5	31		0.0000	1.0000	99.15
113.5	31		0.0000	1.0000	99.15
114.5	31		0.0000	1.0000	99.15
115.5	31		0.0000	1.0000	99.15
116.5	31		0.0000	1.0000	99.15
117.5	31		0.0000	1.0000	99.15
118.5	31		0.0000	1.0000	99.15

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 360.50 LAND RIGHTS

ORIGINAL LIFE TABLE, CONT.

AVG AGE RET 8.1		001		EXPERIENCE ANALYSIS	
PLACEMENT BAND 1905-2013				EXPERIENCE BAND 1994-2024	
AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
119.5					99.15
TOTAL	10,761,187	842			



INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 360.50 LAND RIGHTS

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1905-2013      001      EXPERIENCE BAND 1994-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
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NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 361.00 STRUCTURES AND IMPROVEMENTS

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1914-2023			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
88.6-S0	4.27	0 - 98		89.1-S0	5.59	41 - 98
84.8-S0.5	3.64	0 - 98		86.5-S0.5	4.45	41 - 98
81.9-S1	4.15	0 - 98		84.5-S1	3.94	41 - 98
79.9-S1.5	5.26	0 - 98		82.8-S1.5	4.40	41 - 98
94.8-R0.5	6.28	0 - 98		90.7-R0.5	7.18	41 - 98
86.9-R1	4.49	0 - 98		85.5-R1	5.47	41 - 98
82.7-R1.5	3.20	0 - 98		82.8-R1.5	4.15	41 - 98
79.6-R2	3.63	0 - 98		80.9-R2	4.00	41 - 98
77.9-R2.5	5.49	0 - 98		79.8-R2.5	5.44	41 - 98
107.6-L0	6.15	0 - 98		104.8-L0	7.66	41 - 98
99.5-L0.5	5.01	0 - 98		99.2-L0.5	6.51	41 - 98
93.1-L1	4.34	0 - 98		94.9-L1	5.50	41 - 98
88.6-L1.5	3.99	0 - 98		91.2-L1.5	4.25	41 - 98
85.1-L2	5.05	0 - 98		88.5-L2	4.23	41 - 98
82.3-L2.5	6.25	0 - 98		85.7-L2.5	5.19	41 - 98
106.0-O1	7.65	0 - 98		98.5-O1	8.68	41 - 98
119.3-O2	7.66	0 - 98			NOT FITTED	
166.7-O3	8.29	0 - 98			NOT FITTED	
200.2-O4	8.38	0 - 98			NOT FITTED	

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 362.00 STATION EQUIPMENT

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1914-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
62.2-S0	1.34	0 - 73		63.2-S0	0.68	28 - 73
60.0-S0.5	3.19	0 - 73		61.6-S0.5	2.38	28 - 73
58.2-S1	5.43	0 - 73		60.3-S1	4.49	28 - 73
57.1-S1.5	7.51	0 - 73		59.3-S1.5	6.85	28 - 73
65.6-R0.5	2.35	0 - 73		64.1-R0.5	2.08	28 - 73
61.0-R1	0.73	0 - 73		60.8-R1	0.89	28 - 73
58.6-R1.5	2.93	0 - 73		59.2-R1.5	3.17	28 - 73
56.8-R2	5.73	0 - 73		58.1-R2	5.79	28 - 73
74.3-L0	2.34	0 - 73		73.6-L0	2.77	28 - 73
69.3-L0.5	1.26	0 - 73		70.0-L0.5	1.40	28 - 73
65.4-L1	2.26	0 - 73		67.2-L1	1.13	28 - 73
62.6-L1.5	4.18	0 - 73		64.9-L1.5	3.16	28 - 73
72.4-O1	4.15	0 - 73		69.0-O1	3.99	28 - 73
81.4-O2	4.15	0 - 73		77.6-O2	4.00	28 - 73
112.7-O3	5.04	0 - 73		105.5-O3	5.12	28 - 73
148.5-O4	5.47	0 - 73		NOT FITTED		

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 364.00 POLES, TOWERS AND FIXTURES

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1942-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
78.8-S0	4.62	0 - 63		NOT FITTED		
72.1-S0.5	3.34	0 - 63		68.3-S0.5	2.24	38 - 63
67.0-S1	1.86	0 - 63		65.8-S1	1.10	38 - 63
63.5-S1.5	1.17	0 - 63		63.5-S1.5	0.80	38 - 63
60.8-S2	2.19	0 - 63		61.8-S2	2.26	38 - 63
59.0-S2.5	3.62	0 - 63		60.4-S2.5	3.98	38 - 63
93.9-R0.5	7.18	0 - 63		NOT FITTED		
79.6-R1	6.14	0 - 63		NOT FITTED		
71.0-R1.5	4.76	0 - 63		64.6-R1.5	2.22	38 - 63
64.9-R2	2.94	0 - 63		62.0-R2	0.68	38 - 63
61.1-R2.5	1.71	0 - 63		60.0-R2.5	1.30	38 - 63
58.3-R3	2.50	0 - 63		58.6-R3	3.39	38 - 63
55.6-R4	6.69	0 - 63		56.9-R4	8.03	38 - 63
103.8-L0	6.12	0 - 63		NOT FITTED		
90.9-L0.5	5.00	0 - 63		NOT FITTED		
81.3-L1	3.53	0 - 63		NOT FITTED		
74.1-L1.5	2.22	0 - 63		72.0-L1.5	1.54	38 - 63
68.7-L2	1.16	0 - 63		68.9-L2	0.96	38 - 63
64.8-L2.5	2.04	0 - 63		65.7-L2.5	2.28	38 - 63
61.7-L3	3.95	0 - 63		63.3-L3	4.47	38 - 63
112.0-O1	7.70	0 - 63		NOT FITTED		
125.9-O2	7.69	0 - 63		NOT FITTED		
181.5-O3	7.86	0 - 63		NOT FITTED		
200.2-O4	7.58	0 - 63		NOT FITTED		

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 365.00 OVERHEAD CONDUCTORS AND DEVICES

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1942-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
58.0-S0	4.49	0 - 59		61.4-S0	3.17	30 - 59
54.9-S0.5	5.94	0 - 59		58.9-S0.5	4.52	30 - 59
52.5-S1	7.80	0 - 59		56.9-S1	6.08	30 - 59
50.9-S1.5	9.52	0 - 59		55.3-S1.5	7.89	30 - 59
63.4-R0.5	2.69	0 - 59		63.5-R0.5	1.98	30 - 59
57.0-R1	3.46	0 - 59		58.6-R1	3.11	30 - 59
53.4-R1.5	5.13	0 - 59		55.9-R1.5	4.74	30 - 59
50.8-R2	7.46	0 - 59		54.0-R2	6.68	30 - 59
71.9-L0	3.12	0 - 59		74.1-L0	1.80	30 - 59
65.6-L0.5	3.86	0 - 59		69.2-L0.5	2.53	30 - 59
60.7-L1	5.26	0 - 59		65.5-L1	3.54	30 - 59
57.2-L1.5	6.90	0 - 59		62.1-L1.5	5.37	30 - 59
72.2-O1	2.82	0 - 59		70.7-O1	1.70	30 - 59
81.2-O2	2.82	0 - 59		79.5-O2	1.70	30 - 59
114.8-O3	3.01	0 - 59			NOT FITTED	
152.8-O4	3.12	0 - 59			NOT FITTED	

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 366.00 UNDERGROUND CONDUIT

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1912-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
70.6-S0	4.44	0 - 68		72.0-S0	5.09	25 - 68
66.3-S0.5	6.13	0 - 68		68.1-S0.5	6.80	25 - 68
63.0-S1	8.12	0 - 68		65.3-S1	8.69	25 - 68
60.8-S1.5	9.95	0 - 68		63.0-S1.5	10.69	25 - 68
78.4-R0.5	2.29	0 - 68		76.7-R0.5	2.75	25 - 68
69.6-R1	3.48	0 - 68		69.3-R1	4.39	25 - 68
64.6-R1.5	5.28	0 - 68		65.2-R1.5	6.33	25 - 68
61.0-R2	7.62	0 - 68		62.2-R2	8.67	25 - 68
88.8-L0	2.50	0 - 68		88.8-L0	3.10	25 - 68
80.3-L0.5	3.78	0 - 68		81.5-L0.5	4.46	25 - 68
73.8-L1	5.44	0 - 68		76.0-L1	6.03	25 - 68
69.0-L1.5	7.32	0 - 68		71.3-L1.5	8.04	25 - 68
90.5-O1	1.98	0 - 68		86.9-O1	1.83	25 - 68
101.7-O2	1.97	0 - 68		97.8-O2	1.83	25 - 68
144.6-O3	1.97	0 - 68			NOT FITTED	
193.2-O4	2.00	0 - 68			NOT FITTED	

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 367.00 UNDERGROUND CONDUTORS AND DEVICES

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1935-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
52.3-S0	2.97	0 - 51		50.0-S0	2.63	26 - 51
49.3-S0.5	2.86	0 - 51		48.3-S0.5	3.87	26 - 51
46.9-S1	3.83	0 - 51		47.1-S1	5.35	26 - 51
45.3-S1.5	5.45	0 - 51		46.0-S1.5	7.24	26 - 51
58.0-R0.5	5.37	0 - 51		51.0-R0.5	2.22	26 - 51
51.6-R1	4.26	0 - 51		47.7-R1	2.94	26 - 51
48.0-R1.5	3.71	0 - 51		46.0-R1.5	4.50	26 - 51
45.4-R2	4.39	0 - 51		44.8-R2	6.44	26 - 51
43.8-R2.5	6.37	0 - 51		43.9-R2.5	8.97	26 - 51
65.7-L0	4.36	0 - 51		59.3-L0	1.96	26 - 51
59.5-L0.5	3.20	0 - 51		56.0-L0.5	1.99	26 - 51
54.8-L1	2.29	0 - 51		53.4-L1	2.62	26 - 51
51.3-L1.5	3.08	0 - 51		51.1-L1.5	4.39	26 - 51
48.6-L2	4.82	0 - 51		49.5-L2	6.38	26 - 51
66.7-O1	6.17	0 - 51		55.9-O1	2.50	26 - 51
75.0-O2	6.17	0 - 51		62.8-O2	2.50	26 - 51
106.5-O3	6.49	0 - 51			NOT FITTED	
142.2-O4	6.65	0 - 51			NOT FITTED	

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 368.00 LINE TRANSFORMERS

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1902-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
45.2-S0	0.67	0 - 65		45.4-S0	0.39	20 - 65
44.5-S0.5	2.87	0 - 65		45.1-S0.5	2.59	20 - 65
43.9-S1	5.32	0 - 65		44.9-S1	4.98	20 - 65
43.6-S1.5	7.59	0 - 65		44.8-S1.5	7.52	20 - 65
46.1-R0.5	2.73	0 - 65		45.2-R0.5	2.09	20 - 65
44.6-R1	1.46	0 - 65		44.4-R1	1.70	20 - 65
44.0-R1.5	3.85	0 - 65		44.2-R1.5	4.44	20 - 65
43.5-R2	6.71	0 - 65		44.1-R2	7.34	20 - 65
51.0-L0	3.79	0 - 65		50.2-L0	4.10	20 - 65
48.9-L0.5	2.02	0 - 65		48.8-L0.5	2.38	20 - 65
47.1-L1	1.58	0 - 65		47.8-L1	1.15	20 - 65
46.1-L1.5	3.25	0 - 65		47.1-L1.5	2.58	20 - 65
45.2-L2	5.64	0 - 65		46.5-L2	5.13	20 - 65
48.3-O1	5.43	0 - 65		46.4-O1	4.96	20 - 65
54.2-O2	5.51	0 - 65		52.0-O2	5.12	20 - 65
71.5-O3	7.59	0 - 65		66.9-O3	7.71	20 - 65
91.9-O4	8.55	0 - 65		84.5-O4	8.90	20 - 65

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING



INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 369.00 SERVICES

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1912-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
79.1-S0	5.39	0 - 61		NOT FITTED		
72.0-S0.5	4.17	0 - 61		NOT FITTED		
66.6-S1	2.61	0 - 61		63.7-S1	1.30	38 - 61
62.9-S1.5	1.57	0 - 61		61.6-S1.5	1.36	38 - 61
60.0-S2	1.61	0 - 61		60.0-S2	2.57	38 - 61
58.1-S2.5	2.90	0 - 61		58.6-S2.5	4.25	38 - 61
95.6-R0.5	7.94	0 - 61		NOT FITTED		
80.4-R1	7.00	0 - 61		NOT FITTED		
71.2-R1.5	5.75	0 - 61		NOT FITTED		
64.6-R2	4.00	0 - 61		60.0-R2	1.48	38 - 61
60.4-R2.5	2.67	0 - 61		58.2-R2.5	2.24	38 - 61
57.5-R3	2.44	0 - 61		56.9-R3	3.99	38 - 61
54.5-R4	6.04	0 - 61		55.3-R4	8.45	38 - 61
53.2-R5	11.74	0 - 61		54.4-R5	15.98	38 - 61
105.0-L0	6.83	0 - 61		NOT FITTED		
91.4-L0.5	5.76	0 - 61		NOT FITTED		
81.2-L1	4.24	0 - 61		NOT FITTED		
73.7-L1.5	2.98	0 - 61		NOT FITTED		
68.1-L2	1.32	0 - 61		66.8-L2	0.98	38 - 61
64.0-L2.5	1.56	0 - 61		63.8-L2.5	2.46	38 - 61
60.8-L3	3.15	0 - 61		61.5-L3	4.55	38 - 61
114.7-O1	8.40	0 - 61		NOT FITTED		
129.0-O2	8.40	0 - 61		NOT FITTED		
186.2-O3	8.54	0 - 61		NOT FITTED		
200.2-O4	8.16	0 - 61		NOT FITTED		

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 370.00 METERS

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1917-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
25.0-S0	6.10	0 - 72		22.7-S0	1.22	9 - 37
25.0-S0.5	6.46	0 - 72		22.7-S0.5	3.29	9 - 37
25.0-S1	7.28	0 - 72		22.7-S1	5.70	9 - 37
25.0-S1.5	8.21	0 - 72		22.7-S1.5	8.12	9 - 37
25.0-R0.5	6.41	0 - 72		22.5-R0.5	1.95	9 - 37
25.0-R1	6.74	0 - 72		22.4-R1	2.79	9 - 37
25.0-R1.5	7.31	0 - 72		22.4-R1.5	5.37	9 - 37
25.0-R2	8.41	0 - 72		22.5-R2	8.17	9 - 37
25.0-L0	4.47	0 - 72		24.3-L0	4.45	9 - 37
25.0-L0.5	4.12	0 - 72		23.9-L0.5	2.66	9 - 37
25.0-L1	4.51	0 - 72		23.5-L1	1.53	9 - 37
25.0-L1.5	5.04	0 - 72		23.4-L1.5	2.79	9 - 37
25.0-O1	7.14	0 - 72		22.6-O1	4.83	9 - 37
25.2-O2	4.50	0 - 72		25.1-O2	5.37	9 - 37
26.4-O3	8.61	0 - 72		30.9-O3	9.10	9 - 37
28.0-O4	12.28	0 - 72		38.0-O4	10.87	9 - 37

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 370.01 METERS - SMART METERS

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 2012-2024      001      EXPERIENCE BAND 2012-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
25.4-S0	0.94	0 - 11			
21.2-S0.5	1.27	0 - 11			NOT FITTED
18.0-S1	2.01	0 - 11			NOT FITTED
16.1-S1.5	2.54	0 - 11			NOT FITTED
41.7-R0.5	1.27	0 - 11			NOT FITTED
31.5-R1	1.15	0 - 11			NOT FITTED
24.7-R1.5	1.05	0 - 11			NOT FITTED
19.3-R2	1.08	0 - 11			NOT FITTED
16.3-R2.5	1.50	0 - 11			NOT FITTED
38.4-L0	0.86	0 - 11			NOT FITTED
30.4-L0.5	0.90	0 - 11			NOT FITTED
24.0-L1	1.33	0 - 11			NOT FITTED
20.3-L1.5	1.71	0 - 11			NOT FITTED
52.9-O1	1.32	0 - 11			NOT FITTED
59.4-O2	1.32	0 - 11			NOT FITTED
87.2-O3	1.33	0 - 11			NOT FITTED
118.4-O4	1.34	0 - 11			NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 371.00 INSTALLATIONS ON CUSTOMERS' PREMISES

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1963-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
45.9-S0	4.09	0 - 46		43.5-S0	3.17	23 - 46
43.3-S0.5	2.39	0 - 46		42.3-S0.5	1.80	23 - 46
41.4-S1	1.19	0 - 46		41.3-S1	1.33	23 - 46
40.1-S1.5	2.31	0 - 46		40.4-S1.5	2.85	23 - 46
39.0-S2	4.28	0 - 46		39.8-S2	4.80	23 - 46
50.4-R0.5	7.19	0 - 46		44.2-R0.5	4.89	23 - 46
45.1-R1	5.43	0 - 46		41.6-R1	3.18	23 - 46
42.2-R1.5	3.62	0 - 46		40.3-R1.5	1.91	23 - 46
40.1-R2	2.25	0 - 46		39.4-R2	2.47	23 - 46
38.8-R2.5	3.45	0 - 46		38.8-R2.5	4.76	23 - 46
37.9-R3	5.79	0 - 46		38.3-R3	7.43	23 - 46
57.1-L0	6.34	0 - 46		51.2-L0	5.29	23 - 46
52.0-L0.5	4.81	0 - 46		48.5-L0.5	4.08	23 - 46
48.1-L1	3.08	0 - 46		46.5-L1	2.89	23 - 46
45.2-L1.5	1.31	0 - 46		44.7-L1.5	1.12	23 - 46
43.0-L2	1.64	0 - 46		43.4-L2	1.78	23 - 46
41.3-L2.5	3.54	0 - 46		42.0-L2.5	4.09	23 - 46
57.6-O1	8.27	0 - 46		47.9-O1	6.27	23 - 46
64.8-O2	8.27	0 - 46		53.9-O2	6.28	23 - 46
91.7-O3	8.70	0 - 46			NOT FITTED	
122.3-O4	8.92	0 - 46			NOT FITTED	

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 371.00 INSTALLATIONS ON CUSTOMERS' PREMISES

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1963-2024			002	EXPERIENCE BAND 1995-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
46.4-S0	4.18	0 - 46		43.8-S0	3.28	24 - 46
43.8-S0.5	2.52	0 - 46		42.6-S0.5	1.95	24 - 46
41.7-S1	1.16	0 - 46		41.6-S1	1.33	24 - 46
40.4-S1.5	2.12	0 - 46		40.8-S1.5	2.59	24 - 46
39.3-S2	4.03	0 - 46		40.1-S2	4.49	24 - 46
51.1-R0.5	7.24	0 - 46		44.4-R0.5	4.89	24 - 46
45.7-R1	5.55	0 - 46		41.9-R1	3.27	24 - 46
42.6-R1.5	3.69	0 - 46		40.6-R1.5	2.00	24 - 46
40.4-R2	2.17	0 - 46		39.7-R2	2.36	24 - 46
39.1-R2.5	3.19	0 - 46		39.1-R2.5	4.50	24 - 46
38.1-R3	5.54	0 - 46		38.6-R3	7.08	24 - 46
58.0-L0	6.41	0 - 46		51.5-L0	5.31	24 - 46
52.6-L0.5	4.87	0 - 46		48.9-L0.5	4.17	24 - 46
48.6-L1	3.16	0 - 46		46.9-L1	3.04	24 - 46
45.6-L1.5	1.37	0 - 46		45.1-L1.5	1.29	24 - 46
43.3-L2	1.51	0 - 46		43.8-L2	1.56	24 - 46
41.6-L2.5	3.35	0 - 46		42.4-L2.5	3.78	24 - 46
58.6-O1	8.31	0 - 46		48.1-O1	6.23	24 - 46
65.9-O2	8.30	0 - 46		54.1-O2	6.23	24 - 46
93.4-O3	8.71	0 - 46			NOT FITTED	
124.6-O4	8.92	0 - 46			NOT FITTED	

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 373.00 STREET LIGHTING AND SIGNAL SYSTEMS

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1930-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
48.1-S0	4.72	0 - 64		47.9-S0	5.90	23 - 64
47.0-S0.5	6.53	0 - 64		47.4-S0.5	7.94	23 - 64
46.2-S1	8.59	0 - 64		47.1-S1	10.04	23 - 64
45.6-S1.5	10.86	0 - 64		46.7-S1.5	12.56	23 - 64
49.6-R0.5	4.55	0 - 64		47.7-R0.5	4.74	23 - 64
47.3-R1	5.68	0 - 64		46.5-R1	7.16	23 - 64
46.2-R1.5	7.82	0 - 64		46.1-R1.5	9.81	23 - 64
45.4-R2	10.34	0 - 64		45.9-R2	12.50	23 - 64
55.5-L0	3.40	0 - 64		53.6-L0	3.07	23 - 64
52.7-L0.5	3.29	0 - 64		52.0-L0.5	3.92	23 - 64
50.4-L1	4.23	0 - 64		50.7-L1	5.17	23 - 64
49.0-L1.5	6.27	0 - 64		49.8-L1.5	7.45	23 - 64
53.0-O1	4.86	0 - 64		49.5-O1	3.25	23 - 64
59.6-O2	4.86	0 - 64		55.6-O2	3.18	23 - 64
80.3-O3	5.56	0 - 64		72.7-O3	3.26	23 - 64
104.3-O4	6.04	0 - 64		92.8-O4	3.79	23 - 64

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 373.01 STREET LIGHTING AND SIGNAL SYSTEMS - LED

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 2018-2023      001      EXPERIENCE BAND 2018-2024

SURVIVOR CURVE	RESID MEAS	RANGE OF FIT	SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
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NOT FITTED

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 390.00 STRUCTURES AND IMPROVEMENTS

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1912-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
70.2-S0	6.56	0 - 70		71.7-S0	7.44	23 - 70
66.3-S0.5	8.35	0 - 70		68.1-S0.5	9.25	23 - 70
63.2-S1	10.42	0 - 70		65.3-S1	11.31	23 - 70
61.2-S1.5	12.32	0 - 70		63.2-S1.5	13.38	23 - 70
77.2-R0.5	3.93	0 - 70		76.2-R0.5	4.84	23 - 70
69.1-R1	5.56	0 - 70		69.2-R1	6.69	23 - 70
64.5-R1.5	7.61	0 - 70		65.3-R1.5	8.82	23 - 70
61.2-R2	10.08	0 - 70		62.4-R2	11.34	23 - 70
87.5-L0	4.34	0 - 70		88.2-L0	5.16	23 - 70
79.6-L0.5	5.80	0 - 70		81.0-L0.5	6.69	23 - 70
73.5-L1	7.54	0 - 70		75.7-L1	8.38	23 - 70
69.1-L1.5	9.51	0 - 70		71.2-L1.5	10.53	23 - 70
88.4-O1	3.04	0 - 70		86.1-O1	3.63	23 - 70
99.4-O2	3.04	0 - 70		96.9-O2	3.63	23 - 70
140.8-O3	2.73	0 - 70			NOT FITTED	
187.8-O4	2.59	0 - 70			NOT FITTED	

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING



INDIANAPOLIS POWER & LIGHT COMPANY  
D/B/A AES INDIANA

ACCOUNT 392.00 TRANSPORTATION EQUIPMENT

SUMMARY OF CURVE FITTING RESULTS - PCT SURV BALANCED AREAS

PLACEMENT BAND 1959-2024			001	EXPERIENCE BAND 1994-2024		
SURVIVOR CURVE	RESID MEAS	RANGE OF FIT		SURVIVOR CURVE	RESID MEAS	RANGE OF FIT*
13.7-S0	8.23	0 - 28		12.8-S0	8.13	8 - 22
13.7-S0.5	7.63	0 - 28		12.9-S0.5	7.38	8 - 22
13.7-S1	7.63	0 - 28		13.1-S1	7.33	8 - 22
13.7-S1.5	7.91	0 - 28		13.2-S1.5	7.61	8 - 22
13.7-S2	8.68	0 - 28		13.3-S2	8.64	8 - 22
13.7-R0.5	9.68	0 - 28		12.5-R0.5	8.93	8 - 22
13.7-R1	9.15	0 - 28		12.7-R1	8.42	8 - 22
13.7-R1.5	8.84	0 - 28		12.8-R1.5	8.24	8 - 22
13.7-R2	9.25	0 - 28		13.0-R2	9.16	8 - 22
13.7-R2.5	9.80	0 - 28		13.1-R2.5	10.14	8 - 22
14.1-L0	9.43	0 - 28		13.2-L0	10.33	8 - 22
14.0-L0.5	8.03	0 - 28		13.2-L0.5	9.20	8 - 22
13.8-L1	6.87	0 - 28		13.2-L1	8.18	8 - 22
13.8-L1.5	5.67	0 - 28		13.3-L1.5	6.63	8 - 22
13.8-L2	5.19	0 - 28		13.4-L2	5.43	8 - 22
13.7-L2.5	5.45	0 - 28		13.4-L2.5	4.80	8 - 22
13.7-L3	6.62	0 - 28		13.4-L3	5.67	8 - 22
13.7-O1	11.12	0 - 28		12.3-O1	10.50	8 - 22
14.6-O2	10.65	0 - 28		13.4-O2	10.69	8 - 22
16.9-O3	14.05	0 - 28		15.6-O3	14.05	8 - 22
20.0-O4	16.35	0 - 28		18.3-O4	15.94	8 - 22

\* SEGMENT BETWEEN 85.0 AND 15.0 PERCENT SURVIVING

**Data Request OUCC DR 26 - 12**

Please identify and explain all Company programs which might affect plant lives. To the extent that these programs are anticipated to affect future life estimates, please explain the anticipated impact in as much detail as possible.

**Objection:**

AES Indiana objects to the request on the grounds and to the extent the request is overly broad and unduly burdensome, particularly to the extent the request seeks “all” Company programs. AES Indiana further objects to the request to the extent it seeks information that is publicly available and equally accessible by the OUCC. AES Indiana also objects to the request on the grounds and to the extent the request calls for speculation. Subject to and without waiver of the foregoing objections, AES Indiana provides the following response.

**Response:**

AES Indiana’s 2022 Integrated Resource Plan Volume I (“IRP”) included as OUCC DR 26-12 Attachment 1 provides a comprehensive look at the Company’s plans and programs that might substantially affect the remaining life of any plant assets. Additionally, the list of major Company programs and plans that could affect remaining lives of plant assets in the future are below.

- Other major Company programs and plans
- Clean Energy Performance Program
- AMI Program
- Multi-Pollutant Plan (“MPP”)
- Federal Implementation Plan (“FIP”)
- Renewable Portfolio Standard (“RPS”)
- Clean Energy Performance Program (“CEPP”)
- NERC Compliance Projects
- TDSIC Plan

Indianapolis Power & Light Company  
d/b/a AES Indiana  
Cause No. 46258  
AES Indiana Responses to IG DR Set 2

**Data Request IG DR 2 - 1**

Please provide the most recent version of Gannett Fleming's database that identifies the recommended life and net salvage parameters by FERC account for the electric utilities that Gannett Fleming has conducted depreciation studies for.

**Objection:**

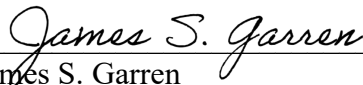
**Response:**

Please see the attachment OUCC DR 2-1 Attachment 1 providing the most recent version of Gannett Fleming's database that identifies recommended life and net salvage parameters by FERC account related to electric utilities for which Gannett Fleming has conducted depreciation studies.

Note: Attachment JSG-5 contains an Excel file

## **AFFIRMATION**

I affirm, under the penalties for perjury, that the foregoing representations are true and correct to the best of my information and belief.

  
\_\_\_\_\_  
James S. Garren  
Consultant  
GDS Associates  
Cause No. 46258

September 9, 2025  
\_\_\_\_\_  
Date

## **CERTIFICATE OF SERVICE**

This is to certify that a copy of the Indiana Office of Utility Consumer Counselor Public Exhibit No. 9 – Testimony of OUCC Witness James S. Garren has been served upon the following in the above-captioned proceeding by electronic service on September 9, 2025:

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